

VOCATIONAL REHABILITATION

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan 13 must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:

(a) **Input of State Rehabilitation Council**. All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

- 1) input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;

The information below details the results of the last comprehensive statewide needs assessment (CSNA) that the TN VR program conducted in 2019. Over the last six months, the TN State Rehabilitation Council (SRC) has worked with VR staff to develop the 2022 CSNA, which will be complete by September 2022. Information and input collected through the 2022 CSNA will be used by the SRC to identify key priorities that will direct the VR program in upcoming years and will be shared in future updates to the statewide plan.

Through data collected during the 2019 Comprehensive Statewide Needs Assessment (CSNA) Survey, the State Rehabilitation Council (SRC) identified seven overarching areas in need of improvement within the Division of Rehabilitation Services (Division). Some of the concerns noted in the VR Portion of the 2016 Combined State Plan are still issues of concern today, while others are new. These seven areas of concern include: talent management, communication and responsiveness, timeliness of services, customer engagement, transportation services, knowledge of community partners and resources, and Pre-ETS. The SRC has addressed these areas in addition to other items in the following input.

- **Talent Management:** As direct client services staff turnover is seen as a disruption in provision of services and negatively impacts the relationship and trust that customers have in the VR program, the SRC recommends that the Division place an emphasis on recruiting and maintaining quality employees at all levels. The SRC recommends that the Division review its salary and benefits packages through benchmarking. While the SRC applauds the Division's efforts to promote from within the organization, new policies and processes should be put in place to speed up the hiring process in order to fill vacancies, reduce client caseloads, and minimize delays in services. The SRC has noted this concern dating back to the SRC Input to the VR Portion of the Combined State Plan in 2016.
- **Communication and Responsiveness:** Transparent and timely communication both internally and externally by the Division and its staff are key to ensuring a smooth delivery of services and dissemination of information.
 - Improving effectiveness in communicating with customers, by communicating via the most effective method for each customer, is vital to ensuring the success of those customers in achieving their employment goals.
 - While the Division is generally included in the DHS Newsletter, the SRC recommends an expansion of this practice and potentially the creation of a separate newsletter that highlights to a greater extent the Division's accomplishments, explores services and current policies, and celebrates customer success stories as a means of marketing the program.

- As the Division embarks on new initiatives, such as reviewing the role of the Community Tennessee Rehabilitation Centers (CTRC's) in the VR process, it is imperative that communication be transparent with both staff and external stakeholders. The SRC appreciates the opportunity provided to the Council for involvement in the review of the CTRC's and encourages the Division to continue to involve the SRC in such initiative.
- **Timeliness of services:** As customers were overall not satisfied with the timeliness and responsiveness of VR staff, as measured via the CSNA, the SRC recommends that the Division take note of customer concerns by reviewing existing policies and fully utilizing all levels of staff to provide services. This effort should focus on improving the length of time it takes to obtain specific services, such as assistive technology, to improve response time of staff and to improve upon follow-up time.
- **Customer engagement:** The SRC recommends that the Division create a robust plan to engage customers in being more active and involved in decision-making throughout their case, including, but not limited to, the development of the Individualized Plan for Employment. We recommend the implementation of a customer satisfaction survey to be conducted periodically during an open case and encourage staff involvement in the development of this process. The SRC also recommends creating and utilizing division stakeholders such as the Centers for Independent Living, Client Assistance Program and the Parent Training and Information Center to conduct quarterly trainings on client rights, informed consumer choice, providing peer support, and self-advocacy in order to encourage customer involvement.
- **Transportation:** Based on CSNA findings, transportation was identified as a major barrier impeding individuals with disabilities from obtaining employment in the community. As such, the SRC recommends that the division reviews policies related to accessing transportation. Policies should be modernized to address the needs in each community, to include ride-share services such as Lyft and Uber where available, to increase the mileage provided to drivers, to create new partnerships with transportation providers, and to increase access to vehicle modifications.
- **Knowledge of Community Resources and Partnerships:** The SRC recommends the development of a method to ensure that division staff receive regular training on existing community stakeholders and resources. This could be accomplished by dedicating time during training or staff conference calls, creating a resources database, and attending community resource fairs. Face-to-face visits during hiring or through alternative worksite locations are another way to learn about other agencies.
- **Pre-Employment Transition Services (Pre-ETS):** The SRC recommends that the Division closely monitor and improve the provision of Pre-ETS to ensure the needs of students with disabilities are being met statewide. In addition, the Division must place a renewed emphasis toward expending the required 15% of federal funds for this service to ensure the Division is able to take full advantage of federal funds to meet the needs of customers across the state in all service areas.

2) the Designated State unit's response to the Council's input and recommendations; and

The recommendations and input offered by the State Rehabilitation Council in 2019 identified the seven (7) priorities listed above, strategically aligned with the modernization and transformation vision of the Division of Rehabilitation Services. At the time, the Division overwhelmingly accepted and agreed with all the priorities identified.

Building on those recommendations, the Division of Rehabilitation Services embarked on a 4-year strategic plan to transform the Vocational Rehabilitation Program and revolutionize the customer experience. Focusing on the customer and the customer experience, the goal of the transformation is to create an environment where individuals and businesses served, along with VR staff and partners feel welcome, informed, and encouraged.

What Transformation Looks Like...

- VR is responsive, welcoming, informative, and encouraging showing individuals and businesses what is possible.
- Businesses seek out VR services to transform their operations and meet their workforce needs and ultimately improve their bottom line.
- CTRCs are transformed into community-based resource centers offering community-based employment training and connecting VR and non-VR customers to education, training, and employment resources.
- Pre-ETS are coordinated, collaborative, connected services that prepare students with disabilities for a seamless transition to life after high school.

To achieve this transformation, the Division has identified 5 strategic priorities outlined in the table below. Each of the strategic priorities listed above can be linked to one or more of the recommendations made by the SRC in 2019.

TN Vocational Rehabilitation Services Five Strategic Priorities

Strategic Priority	Strategic Goal
Communication	Foster trust and credibility with internal and external stakeholders through reliable, accurate, transparent, and timely two-way communication.
Talent Management	Support a professional workforce that is organized and structured to deliver high quality vocational rehabilitation services through effective teams.
Modernization of Systems and Processes	Implement integrated systems and business processes that promote operational efficiency and programmatic effectiveness focused on the customer experience.

Revolutionize Service Delivery

Build innovative and effective service delivery models to better support businesses and individuals with disabilities in driving the achievement of their employment goals.

Data Driven Services and Outcomes

Achieve improved employment outcomes for people with disabilities through data driven rehabilitation services and employment initiatives.

Since 2019, the Division has made tremendous progress on all the identified priority areas. Notable accomplishments in the advancement of these strategic priorities include:

- Implementation of a new case management system,
- Delivery of new staff training,
- Complete revision of VR policies and procedures, and
- Restructuring of staff classifications and compensation to modernize positions and align with the transformation.

It is impossible to discuss the accomplishments and innovations of the Vocational Rehabilitation program over the last couple of years without addressing the impact that the COVID-19 pandemic had on program operations. Overall, the Vocational Rehabilitation program fared extremely well in adapting to virtual and remote service delivery options. In many ways, the VR program's plans for modernization and transformation made the transition less disruptive to service delivery and our customers. And in other ways the pandemic accelerated the transformation in ways we could not have anticipated.

Beginning in March 2020, VR staff were asked to begin working from home or other remote locations while socially distancing as a safety precaution. What began as an effort to stop or slow the spread of COVID-19 became a shining example of transformation, demonstrating the flexibility, creativity, and resiliency of our VR staff. Not only have staff adjusted to this new way of working over the last two years, but they have also excelled, never missing a beat, and continuing to provide excellent customer service, helping customers navigate these uncertain times and ensuring that customers are receiving the services they need in the manner they are most comfortable with.

During the COVID-19 pandemic, VR staff demonstrated flexibility and resourcefulness in the use of technology, as well as basic VR guidance and counseling methods to ensure continued customer access to services. VR staff found themselves using a variety of technology to deliver services, including telephonically, online, and web-based, and providing services via distance learning platforms. In April 2021, VR leadership provided iPhones to all VR Counselors as another way to communicate with customers. Facetime became the primary platform for meeting virtually. Also, text message options allowed another layer of accessibility that did not exist before.

Additionally, VR has provided tools and resources to our community rehabilitation providers (CRPs) to support them in providing services in new and innovative ways. Guidance and tools to accept electronic signatures, along with resources on virtual and remote service delivery have all played a key role in increasing the flexibility of VR services and continuing to meet the needs of customers through the uncertain times that the pandemic presented to the world.

Moving forward, the VR program will continue to use lessons learned during the COVID-19 pandemic to continue to identify and offer innovative and flexible services to customers. We will continue to learn and grow and most importantly will continue to focus on delivering services in a community-based, person-centered manner.

Below are specific updates to the priorities that were identified in 2019.

1. Talent Management

Over the last several years, VR senior leadership has reorganized leadership positions and created additional key positions to increase capacity, knowledge, and expertise across all program areas. Various units within the Division have grown to address the needs of those we serve, providers that we work with, and our key stakeholders.

Specifically, over the last year, VR senior leadership has taken on a tremendous project to review and reorganize VR field positions. To address high turnover and staff attrition, attract and retain top talent within VR, and improve customer experience outcomes, the division evaluated the existing staffing model and made changes to ensure that classifications align with the roles and responsibilities of a modernized, community-based vocational rehabilitation program and that compensation is commensurate with position qualifications, responsibilities, and fair market value. As a result, five new classifications were created for the division and two existing classifications experienced salary increases. The new classifications create a career pathway with opportunities for growth and advancement within the division. The outcome of the salary increases include an 8.5% increase in the average salary and an estimated \$700,000 investment in staff pay.

In addition to modernizing our approach to staffing, the division has also been focused on supporting its staff across the state by implementing various training initiatives. At the end of 2020, the division, in partnership with the TDHS People Operations team, launched the first two modules of the newly created DRS Connecting Opportunities, Resources, and Education (CORE) training. This training replaced the previous New Counselors Institute (NCI) and will be the primary onboarding training for new staff joining the division. The first two modules of CORE are offered to all new division staff, regardless of their role, and the curriculum has been designed to align with the division's mission, vision, values, and overall transformation. The training is driven by the principles that Everyone Can Work and that all interactions with customers incorporate the Person-Centered philosophy. Throughout fall 2021 and winter 2022, VR leadership are continuing to work with People Operations on the creation of the remaining CORE modules, which will be offered first to VR Counselors and will be focused on service delivery during the various phases of the customer journey within VR.

Additionally, in August 2020, the division kicked off statewide person-centered training for all Vocational Rehabilitation staff – Counselors, Business Employment Consultants, Pre-Employment Specialists, Support Staff, Supervisors, TRC-Smyrna, CTRCs, TBE, Independent Living (IL), Central Office staff and Leadership. The initiative, funded by the TN Council on Development Disabilities, was conducted by consultants from Griffin-Hammis Associates, and was broken down into various activities over the last year and a half. The first activity offered an introduction to person-centered thinking, while the second activity offered staff a deeper dive into putting theory into practice. Both activities were offered virtually, with additional online learning modules staff were asked to participate in, as well as additional readings and activities that staff were asked to complete and discuss with their supervisors and teams. Currently, Griffin-Hammis is engaged in a third, follow-up activity for specific teams across the division.

that aims to truly operationalize the Everyone Can Work training in various settings and work with the teams on continuous quality improvement.

2. Communication and Responsiveness

The VR Program has been and continues to be committed to increasing the way that we communicate internally, as well as externally, to ensure that we are actively sharing information and that the information we are sharing is consistent. To that end, over the last few years, we have deployed various technologies to assist in external communication efforts. One of these efforts was the implementation of a virtual chatbot in 2021 that is housed on the DHS website and is pre-programmed with answers to questions about VR services. Interactions with the chatbot are designed to mimic conversations with a person. One of the largest benefits of the chatbot is that it is available 24 hours a day, 365 days a year. We have observed that a large percentage of traffic received through the chatbots is coming after normal office hours, thus expanding our ability to provide communication during off hours.

Additionally, in January 2022, the VR program launched a cloud-based phone system, utilizing the Nice inContact phone platform, that includes Interactive Voice Response (IVR) to provide incoming callers with information about the VR program, before having to speak to a VR staff member. This IVR is set up similarly to the chatbot and mimics human conversation. Additionally, through this new phone system, customers are also able to opt into a follow-up survey that gathers their thoughts and opinions on the customer service that they received throughout the call. This feedback, as well as other analytics gathered through the new phone system, will be used to continually improve staff's customer service skills, and refine what information may be most beneficial to include in the IVR.

As a result of the 2019 CSNA, the SRC recommended the creation of a VR-specific newsletter that highlights to a greater extent the Division's accomplishment, explores services and current policies, and celebrates customer success stories as a means of marketing the program. A Pre-ETS- specific newsletter titled "Let's Talk Pre-ETS in Tennessee" has been created with the first edition being published and shared on April 1, 2021. The newsletter contains information to keep readers informed of pre-ETS happening and successes and is disseminated quarterly to internal staff, contractors, schools, and other stakeholders (anyone is eligible to sign up with an email address to receive the electronic newsletter). We are currently exploring the possibility of creating a newsletter that encompasses all VR programs to share with contractors, stakeholders, partners, and internal team members.

The State Rehabilitation Council (SRC) Outreach, Public Relations, and Awareness Committee made site visits, reviewed current marketing materials (both hard copies and online) and made recommendations for updating materials to ensure programs are adequately represented and the graphics used show a modernized VR serving a diverse group of customers. The committee is also currently reviewing the VR website to ensure plain language is used to describe the various VR programs, including Independent Living, Independent Living Older Blind, Pre-ETS, CTTC, TRC Smyrna, Business Services Unit, etc. VR leadership and staff continue to explore ways to better share success stories. As we transform our division, the ability to share updated and accurate information among our staff, partners, and the public is a high priority.

VR leadership has also been working to increase internal communication. An employee engagement survey was conducted in 2020 and to foster trust and credibility with VR employees, the full survey and results were shared with team members. Intentional discussion of the results occurred with all staff statewide. Discussions occurred in smaller groups and focused on identifying strengths, weaknesses, and opportunities to maintain and enhance employee engagement. Feedback, including recommendations,

were compiled and shared with VR leadership. In relation to communication VR Employees had this to contribute:

In general, everyone felt communication had improved drastically in recent years but there was still work to do. Many remarked that the communication related to Aware implementation has been the best yet and offered plenty of time to become familiar with changes before having to change processes and activities. Many feel that at times communication comes from too many directions (policy, systems, leadership, HR, QISS) or seems to be one-off suggestions or changes without a planned approach for implementing or ensuring upstream and downstream effects are conveyed. Recommendations for improving communication include a feedback loop for staff to report how changes went, regular newsletter and including CRPs in communications which may or may not have a direct effect on them.

Lastly, VR leadership has also worked to increase the usage of the Intranet available to staff, most notably in terms of creating a repository for training information and resources for staff to use. This will continue to be used as a communication tool moving forward and has proven successful in ensuring that staff have one central place to go for the information that they are seeking.

3. Timeliness of Services

Over the last several years, the VR Program has been intentionally evaluating internal business processes and service delivery mechanisms. We've identified what works well and have also identified opportunities for change.

Over the last two years, VR staff worked diligently on the implementation of a new case management software system, called Aware, that supports VR business processes and increases efficiency for both staff and customers. Many staff from across program lines were part of the implementation team and worked together, along with the vendor, throughout all project phases including adaptation, data migration, identifying and designing needed customizations and interfaces, multiple phases of testing, training, and finally preparing for statewide rollout of the system.

On July 7, 2021, Aware, went live statewide and serves as the division's system of record, or authoritative data source. In the months following the rollout of the new system, the team has continued to work diligently to work out the "kinks" of this new system and to support field staff during this transformation by offering virtual office hours, additional training material, and identifying enhancements needed to improve workflow, service, and payment delivery.

To further support the implementation of the new case management system and to advance the person-centered philosophy embedded within VR culture, the division has revised VR policies and procedures to better align with the overall transformation of the VR program. The revised policies and procedures are organized to follow the customer journey through the VR program. In addition, the revisions have eliminated unnecessary restrictions and overly prescriptive language where possible and identified strategies for applying person-centered philosophies to policy. The SRC and other stakeholders were engaged throughout the review process providing input and feedback on policy drafts prior to the official public comment period that opened in April of 2021. Staff and providers were trained on the new policies and business practices in the summer of 2021 prior to the implementation of the new case management system in July 2021.

As a direct result of the above actions, over the coming years, the Division will be focused on what our data tells us about the program that we run and the services that we provide. This data will enhance the capacity of staff to use and analyze data to inform and improve practices and outcomes.

4. Customer Engagement

In addition to the CSNA that is conducted jointly by the SRC and the VR program every three years, another tool used to assess customer satisfaction are ongoing surveys of VR customers at four significant stages of the VR customer journey – application, plan development, service provision, and closure. Specifically, these surveys are provided to customers through key documents that are mailed to the customer at these stages of their journey. Each survey is a quick five question survey designed to gain essential feedback without overburdening the customer. While these surveys provide a glimpse into the reported satisfaction of VR customers, there is still considerable work for the VR program to do in increasing the number of customers that complete surveys at each stage of the process. Increasing customer engagement and improving the tools available to capture the voice of the customer are strategic priorities for both the Department of Human Services and the Division of Rehabilitation Services. The department will continue to use customer insights to define and prioritize experience requirements and opportunities for improvement.

5. Transportation

Transportation is commonly cited as one of the leading barriers that impedes individuals with disabilities from obtaining employment in the community. Over the last two years, great progress has been made in the state of TN to address this barrier. Several years ago, a small group of concerned stakeholders began meeting to brainstorm ways to address this barrier. What started as a small group of invested partners grew exponentially over the years and became a transportation working group, informally convened by the Council on Development Disabilities. This working group brought together various state agencies, local government representatives, and nonprofit entities to collaborate and brainstorm on ways to address the overall transportation barrier impacting Tennesseans, regardless of disability. The efforts of this group were reported out to the Employment First Task Force.

Over the last two years, this group, was able to lobby for and create a dedicated [Tennessee Office of Transportation and Mobility](#) (OMAT), housed under the TN Department of Transportation. The transportation working group has now been retired and replaced by this formal state government office. The purpose of the office is to provide resources and expertise for expanding and improving accessible transportation and mobility across the state of TN. Since its inception, OMAT has created a five-year strategic plan and has produced the state's first annual report about accessible transportation in TN, both of which are available on the OMAT website.

OMAT is in the process of creating a Statewide Advisory Board and Regional Subcommittees to advise OMAT staff and to help implement the office's strategic priorities. The VR Program will continue to be involved with OMAT and has identified a staff representative to sit on the Advisory Board and will identify staff to participate in the Regional Subcommittees as they are implemented.

6. Knowledge of Community Resources and Partnerships

VR program leadership has been working with VR staff to help increase their knowledge of community resources, partnerships, and to identify additional opportunities to work with and educate community partners on service delivery and disability awareness.

In 2021, nine VR team members became certified trainers of the Windmills disability awareness training program. Windmills equips business leaders and others with the knowledge, skills, and tools to create a workplace inclusive of individuals with disabilities. Windmills has a proven history of assisting those with and without disabilities to better understand the culture of disability in the workplace. The 12-module curriculum relies on interactive methods to help participants recognize the benefits of diverse experiences and abilities, improve communications with and about people with disabilities, learn about accommodations, and understand the basics of disability employment law. Training is customized to meet the needs of business leaders or other entities who want to achieve these learning objectives. To date, more than 25 training sessions have been provided to businesses across the state.

One of the VR program's most notable service delivery transformations is illustrated in the Community Tennessee Rehabilitation Centers (CTRCs) transformation from a workshop model of service delivery into community-based resource centers offering community-based employment training, and connecting VR and non-VR customers to education, training, and employment resources.

R.I.S.E. – Road to Independence, Success, Employment – is what VR has branded the new community-based service delivery model for the CTRCs. With R.I.S.E. the centers have become community-based person-centered services that prepare and support individuals in going to work. The services are provided within the community with the support of local partners such as businesses, non-profits, city, county, and state agencies, as well as local education agencies.

R.I.S.E. core services are the vocational rehabilitation services that all 17 CTRCs will provide under the service delivery model. Services may look a little different from one county to the next because of unique labor markets and community characteristics, but all 17 CTRCs will provide R.I.S.E. core services.

Independence services include assisting a customer with discovery – researching social capital contacts, creating a vocational profile, conducting assistive technology assessments, researching training opportunities like apprenticeships and certification classes, and touring Tennessee Centers of Applied Technology (TCATs), colleges or training schools. Independence services also include community access and inclusion services that assist a customer with exploring transportation routes, drivers' education preparation, locations of food banks and faith-based organizations, and assisting with other TN Department of Human Services (TDHS) and state services like food assistance, mental health, or housing.

Success services include job coaching, job supporting, coordinating job retention assistance or other extended services to support a customer with employment training.

Employment services include career readiness and career assessment services like mock interviews, soft skills training, assisting with certification training, conducting job tours, job shadowing, coordinating apprenticeship or pre-apprenticeship opportunities, and work-based learning.

Over the last year, to help the VR program achieve this new community-based service delivery model and deliver R.I.S.E. services, the CTRCs identified and implemented three pilot programs as alternatives to the workshop model. The goal of the pilots was to increase referrals to the VR program, increase competitive integrated employment outcomes for VR customers, and to be replicated at other CTRCs

across the state. CTRC Columbia implemented a pilot to develop a competitive integrated work-based learning summer work experience for incoming juniors or seniors with disabilities to promote employment and/or postsecondary educational attainment. CTRC Shelbyville implemented a community-based pilot with a focus on career exploration and independent living in the local Shelbyville community for youth ages 14 – 22 who are at risk to becoming employed or enrolled in an educational program. CTRC Greeneville implemented a job-driven model to strengthen collaboration, communication, and integration of employers, community partners like community colleges, and individuals with disabilities in the local Greene County workforce. The CTRCs continue to grow and expand on these pilots and are consistently identifying new community partnerships that will lead to additional community-based service delivery models.

7. Pre-Employment Transition Services (Pre-ETS)

The Vocational Rehabilitation program continues to make progress in the delivery of pre-employment transition services (Pre-ETS) to students with disabilities ages 14-22 across Tennessee, despite the impact COVID-19 had on in-person instruction. Pre-ETS include counseling in post-secondary education, career exploration, self-advocacy, workplace readiness, and work-based learning. Much like the conclusion of the 2020 school year, the 2020-2021 school year had to be approached differently to ensure Pre-ETS were still made available statewide to eligible and potentially eligible students.

In addition to the Pre-ETS services provided by Community Rehabilitation Providers (CRPs), VR works directly with local school districts through the Transition School to Work (TSW) program. The TSW program focuses on the provision of Pre-ETS to eligible and potentially eligible high school students with disabilities who are interested in employment after leaving high school. During the 2020-2021 school year, VR operated 58 Transition School to Work programs across the state. Additionally, VR was proud to bring on two new school districts who are providing Pre-ETS, bringing the total to 60 school districts. This includes being able to partner with an additional school district that is in an economically distressed county. As of the fall of 2021, there are only three school districts residing within a distressed county who do not have a TSW; however, Pre-ETS are made available through CRPs. During the 2020-2021 school year, the number of individuals receiving at least one Pre-ETS through VR's contracted CRPs and TSW programs was 36,523 with a total of 76,481 units provided.

As mentioned above, the provision of Pre-ETS during the 2020-2021 school had to look different than previous years to be able to meet the varying school models across the state (i.e., in-person, virtual, and/or hybrid). To meet the needs of the school districts and students, Tennessee VR continued to make available virtual Pre-ETS. As a result, Tennessee VR has been highlighted for the accomplishments made over the past year which saw on average 50% of services being provided virtually. This resulted in as many as 2,000 students in some months able to receive Pre-ETS virtually and saw an increase from 1,715 students in program year quarter one (PY Q1) receiving Pre-ETS, to 5,538 students in program year quarter four (PY Q4). This was accomplished by providing training, resources, and guidance throughout the year to CRPs and TSWs through online training, the creation of a quarterly Let's Talk Pre-ETS in Tennessee newsletter, and new virtual training content and webcasts made possible through VR's partnership with the Vanderbilt Kennedy Center.

In May 2021, VR entered a 5-year contract with the Vanderbilt Kennedy Center to administer Transition Tennessee, a virtual learning platform for educators, students, and families. As a result, a tremendous amount of content and training have been produced and delivered online to Pre-ETS providers and students this year. Over 15,961 unique users have accessed the Pre-ETS portal. Further, a Pre-ETS

Manual for providers was developed to provide guidance, resources, and best practices in service delivery. Additional content will continue through the upcoming contract, but the focus will shift from developing content to implementing practices that ensure quality services are provided and student outcomes are positively impacted. This will be done by developing a Pre-ETS Scope and Sequence guide, providing more training opportunities in collaboration with education partners, and establishing model demonstration sites.

As research has shown us, a strong predictor for post-school employment outcomes is providing paid work experiences for students with disabilities while still in high school (Carter, Erik, Austin, and Trainer, 2011). Therefore, Tennessee VR sought to provide a structure and process to developing high-quality work-based learning (WBL) capstone experiences for students receiving Pre-ETS. The expectation for the WBL capstone experience is for students to be immersed in a business within the community setting for at least 15 hours each month for a maximum of 90 days. Several CRPs were able to establish summer work experiences for students and that trend has continued into the start of the school year for the fall of 2021. The initial anecdotal information point to this being a very promising practice that can lead to increased employment outcomes.

Lastly, over the last two years, the division hired a newly created leadership position, VR Fiscal Director, who is responsible for understanding and tracking the unique budgetary needs and requirements of the VR program. This will allow the division to have a better overall view of the VR program's budget, including the need to meet the 15% requirement for Pre-ETS.

- 3) the designated State unit's explanations for rejecting any of the Council's input or recommendations.

Not applicable.

(b) Request for Waiver of Statewideness. When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

- 1) a local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;

Waiver not requested.

- 2) the designated State unit will approve each proposed service before it is put into effect; and

Waiver not requested.

- 3) requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

Waiver not requested.

(c) Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System. Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

- 1) Federal, State, and local agencies and programs;

The Division has interagency cooperation, collaboration, and coordination with other state and local entities that are not components of the Statewide Workforce Investment System.

The Division works in cooperation with the following federal, state, and local agencies and programs to provide services for individuals with disabilities:

- The Department of Intellectual and Developmental Disabilities (DIDD) refers individuals with intellectual and developmental disabilities to the Vocational Rehabilitation program.
- The Department of Mental Health and Substance Abuse Services (TDMHSAS) works with the Division to employ an evidence based Individual Placement and Support (IPS) model of supported employment for individuals with mental illness and substance abuse disorders.
- The Tennessee Employment Consortium, which is an independent association of community rehabilitation providers and state agencies developed jointly by the Division, the Department of Intellectual and Developmental Disabilities, and the Tennessee Council on Developmental Disabilities, was established to provide a forum for all stakeholders to review and discuss state policies and share best practices.
- University of Tennessee, Center for Literacy Education and Employment provides marketing to businesses the services provided by the Division, to recruit businesses to hire the Division's clients and to provide staff training and development and consultation services for community supported employment service providers.
- Tennessee Division of TennCare (TennCare) partners with the Division for the provision of services for individuals enrolled in Employment and Community First CHOICES. ECF CHOICES serves individuals with intellectual and developmental disabilities who are receiving home and community-based programs under Medicaid Long Term Services and Supports.
- The Tennessee Department of Education (DOE) for the provision of Pre-Employment Transition Services, transition services, and other VR services provided by VR to students with disabilities to support an efficient transition from secondary school to post-school employment and related activities leading to competitive integrated employment.
- The Division is a party to the Interagency agreement between DOE, DIDD, the Tennessee Department of Health, TDMHSAS, the Tennessee Department of Correction, and TennCare to fulfill the requirements of Part B and Part C of the Individuals with Disabilities Education Act (IDEA). The partner agencies strive to ensure that individuals and youth with disabilities are prepared for competitive integrated employment with access to necessary support services.

- Tennessee Department of Corrections for the provision of community resources to offenders on probation or parole who participate in the TDOC Day Reporting / Community Resource centers.
- Tennessee Works for employment partnerships and collaborative efforts to increase access to meaningful work and internet-based information for students with disabilities.
- The Department of Human Services Family Assistance and Child Support Division for individuals participating in services under the Temporary Assistance for Needy Families (TANF) program.
- Tennessee AgrAbility program for professions in agriculture production. This is a cooperative effort of the University of Tennessee Agricultural Extension Service, Tennessee State University Cooperative Extension Program, and Easter Seals in Tennessee and the division's State Grant for Assistive Technology program, the Tennessee Technology Access Program (TTAP) and their network of technology centers.
- Tennessee Technology Access Program (TTAP) that increase access to, and acquisition of, assistive technology devices and services. Through its four core programs: Funding Assistance, Device Demonstration, Device Loan and Device Reutilization.
- Tennessee Council for the Deaf, Deaf-Blind and Hard of Hearing (TCDDBBH) that operate in six communities and provide interpreter services and consultation.
- Statewide Independent Living Council to advance advocacy and independence for Tennesseans with disabilities by collaborating with all interested parties.
- Tennessee Centers for Independent Living that operate in six local communities are operated primarily by persons with disabilities and provide a variety of independent living services.
- Community Rehabilitation Providers throughout the state that provide rehabilitation services under a delegated authority.

2) State programs carried out under section 4 of the Assistive Technology Act of 1998;

Response provided in section c.1 above.

3) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

Response provided in section c.1 above.

4) Non-educational agencies serving out-of-school youth; and

Response provided in section c.1 above.

5) State use contracting programs.

Response provided in section c.1 above.

(d) Coordination with Education Officials. Describe:

- 1) The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

The Division has chosen to provide Pre-ETS through Transition School to Work agreements with Local Education Agencies (LEAs) for interagency transfer, Pre-ETS contracts through Community Rehab Providers (CRPs), Pre-ETS Summer Camps, and direct staff contact. In addition, VR staff collaborate to provide information VR sessions to students while in high school who may benefit from further VR services and seek to acquire additional VR referrals through this process.

Figure 11: TN VR Pre-ETS Graphic

The Division employs 23 Pre-Employment Transition Specialists and four Pre-Employment Transition Supervisors to coordinate services provided in their areas, identify Local Education Agencies (LEAs) who have a need for Pre-ETS, and recruit CRPs. They match interested schools and willing CRPs and/or provide services where there are students with disabilities who need the service.

The Pre-Employment Transition Specialists work with the schools to identify students who are of working age who want to become VR clients and make referrals to the VR Counselor assigned to the school.

As of January 2022, there are 26 Pre-Employment Transition Community Rehabilitation Providers and 60 LEAs contracted to provide services.

Transition Tennessee

An important feature that helped to operationalize the interagency agreement between TN VR and the Department of Education is the creation of TransitionTN.org. This online professional development and resource hub is funded by both the Tennessee Department of Education and Tennessee Vocational Rehabilitation. The site provides portals into an educator blueprint and a provider blueprint where users can participate in asynchronous professional development and get acquainted with a host of resources. For example, there is a Transition Framework, age-appropriate transition assessment database, searchable curriculum database, and so much more. While much of the content was targeted towards a specific target audience, the content in both the educator and provider portals provide cross training opportunities.

Tennessee VR continues to work with the Vanderbilt Kennedy Center and Transition TN to update and develop new content and resources for Pre-ETS providers. In addition, we are now offering content directly to students to receive Pre-ETS in a self-paced manner or through the use of an instructor led online session. In upcoming years, we will be developing school districts a model demonstration sites to highlight best practices and use as a training resource for other school districts and provider agencies.

Policy

The Division has policies and procedures governing Pre-employment Transition Services (Pre-ETS). These policies and procedures are designed to support field staff in providing quality services and resources to students with disabilities in Tennessee and encourage collaboration between school personnel, contractors, and VR staff. The Pre-ETS policy also explains the process if the student desires to apply for VR services. The goal of the policies and procedures is to offer experiences that can assist transition students to a more positive and encouraging competitive employment outcome.

- 2) Information on the formal interagency agreement with the State educational agency with respect to:
 - (A) consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;

The Division entered into an exclusive Interagency Agreement with the TDOE in October 2017 for the provision of pre-employment transition services (Pre-ETS), which is still an active agreement. The Agreement lays out the Purpose of the Agreement, VR responsibilities, DOE responsibilities, and mutual responsibilities. DRS was aided by WINTAC, an RSA technical assistance contractor. Training was conducted across the state at the Supervisors of Special Education Study Councils, the Passport to the Future Conference, and the TDOE Partners in Education conference from 2018 - 2021. For the summer of 2022, transition academies are being developed to provide cross-training to school-based transition coordinators and teachers, along with Pre-ETS providers. During the 2022 year, Tennessee VR and TDOE will be developing a new five-year interagency agreement for the provision of Pre-ETS.

Tennessee VR utilizes 23 Pre-Employment Transition Specialists to provide consultation and technical assistance to education agencies. Each county and local school district has an assigned Pre-ETS Specialists who is required to provide ongoing support, coaching, and technical assistant. Furthermore, the Pre-ETS Specialist complete a monthly VR referral sheet to foster a smooth transition from potentially eligible students receiving Pre-ETS to VR referral, application, and if eligible, VR customer.

Tennessee VR serves alongside the Tennessee DOE in multiple state-level tasks force to promote a shared responsibly and visions for transition planning and services. Some of the groups include, but are not limited to the following:

- TN DOE Transition Leadership Team
- Employment Roundtable
- TennesseeWorks Partnership
- Governor's Employment First Task Force

By serving in these capacities, TN VR has continued to ensure a strong working relationship at the state level with the state education agency. This results in joint planning of state level initiatives, consistent messaging to local school districts, and a deeper understanding of the interplay between the two. One example of how these partnerships produces results is in the design and implementation of DOE permanent course offerings in schools. The TN DOE recognized the important of the Pre-ETS and transition services, while also understanding the limited scheduling opportunities for many students due to graduation requirements. Therefore, upon learning more about Pre-ETS from VR, the TN DOE proposed three credit bearing courses to be made available to students with the course standards having a strong focus on Pre-ETS. The three courses now approved by the Tennessee State Board of Education under the heading of Principals of Transition for Postsecondary Readiness are:

- Introduction to Self-determination
- Focus on Adulthood
- Planning for Postsecondary

(B) transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

Furthermore, Project SEARCH (a business led partnership between VR, the host business, and a local education agency) has a curriculum guide that has now been adopted by the Tennessee State Board of Education and a permanent course code for enrolling Project SEARCH will be made available statewide starting in the 2022-23 school year.

The IEP team, which should include the Division's staff when invited and when available, parent and student, determines that the student should be referred for VR services. The Division's staff should inform the student and parents, preferable at the IEP meeting, the purpose of the vocational rehabilitation program. VR Staff make every effort to attend IEP meetings, however due to staff resources this is not always possible. Information regarding VR Services is made available during IEP meetings.

Beginning in October 2015, IEP meetings now include information on pre-employment transition services that are available at age 14. Pre-ETS services are available to students with disabilities ages 14-22. Pre-ETS services can be provided without an application for VR services. For those individuals that are interested in applying for services, the information should include the application procedures, the eligibility requirements including the Order of Selection, and the potential scope of services that may be

available. As soon as possible after referral, the Division takes an application from the student and determines eligibility as well as whether the student is in an open priority category. If the student is in an open priority category, the Division's staff assists in the formulation of the student's IEP and the student's vocational rehabilitation Individualized Plan for Employment (IPE) as soon as it is determined that the student can benefit from services provided by the Division in preparation for exiting the school system and transitioning into training and/or employment. IPEs are developed within 90 days from the date of eligibility determination, and prior to exit from school.

(C) roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

A no cost interagency agreement between the Tennessee Department of Education (TNDOE) and the Division describes the roles and responsibilities of each to ensure that individuals who are IDEIA eligible and meet the Division's eligibility requirements and will receive VR Services through a comprehensive and coordinated effort. The agreement negotiated between both agencies is very specific in defining the specific responsibilities for each.

For the Division, VR is responsible for various aspects of making its services available to students with disabilities, including the five (5) required Pre-ETS services through VR staff, contracted CRPs and LEAs. While not a comprehensive list, some of the specific responsibilities of the Division include: providing Pre-ETS on an individual or group basis; providing materials and information regarding the VR process and services; accepting referral of students with disabilities who choose to pursue VR services beyond Pre-ETS; consulting with LEAs on transition planning to prepare a student to move from school to work or postsecondary education; providing information to parents and/or guardians, students/clients; and informing teachers, students, parents and legal guardians of the Rehabilitation Act requirements and implementing regulations.

The Tennessee Department of Education has accepted responsibility for helping the Division encourage participation of Tennessee's over 130 independent LEAs in the provision of Pre-ETS services and helping assure that parents, students and teachers are aware of and have access to Pre-ETS through multiple delivery methodologies including, but not limited to: encouraging LEAs to distribute the Pre-ETS materials to students, family members, guardians, or their representatives; emphasize transition best practices with all LEAs; expand existing technical assistance, training and transition reference materials to include information regarding WIOA to LEAs and other stakeholders, including encouraging the Tennessee Parent Training and Information Center to share information with parents, families, guardians and students relating to the provision of Pre-ETS; develop active communication and outreach efforts to make parents and students aware of coordinated Pre-ETS activities; and provide VR and stakeholders regarding TNDOE's adopted written policies and guidelines regarding compliance with WIOA including the coordinated provision of Pre-ETS.

To ensure that all parties, including the Division, TNDOE and LEAs fully understand and comply with the subminimum wage provisions of WIOA, the following term of the interagency agreement and provider contract was agreed to and included in those documents: "Neither DOE nor a LEA in Tennessee shall enter into an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a student with a disability is engaged in work at a subminimum wage. Both parties shall adhere to the documentation requirements under Section 511 of the Workforce Innovations Opportunity Act (WIOA) for students with disabilities seeking subminimum wage employment."

Similar to the agreement between the Division and TNDOE, the Division constructs its contracts with CRPs and agreements with LEAs as referenced in section d.1 above with very specific terms for each respectively that includes CRP or LEA terms that outline expected deliverables, timelines, reporting, outcomes and reimbursement procedures. Those scope and general terms are similar regardless of which procurement method is used and include: provision of the Pre-ETS activities for students with disabilities ages 14-22 in accordance with the Public Law 113-128, Workforce Innovation and Opportunity Act of 2014 (WIOA), Section 422, and Code of Federal Regulations, Title 34, Part 361, as amended; assure that only staff meet minimum qualifications detailed in the agreement provide services; accommodate the needs of students with disabilities in compliance with state and federal law, including without limitation the Americans with Disabilities Act; obtain written permission from the student's parent or guardian for demographic information and disability certification; and provide monthly fiscal and program reports of its Pre-ETS activities that document details of services provided.

The LEA is responsible for the educational costs related to the provision of special education and related services for the individual attending school. The agreement states that if another public agency is obligated under federal or state law or assigned responsibility under state policy to provide or pay for any services that are considered special education or related services and are necessary for ensuring FAPE to students who are IDEIA eligible, the public agency shall fulfill that obligation or responsibility, directly, through contract or by another arrangement. However, failure of that public agency to pay for that service does not relieve the LEA of its obligation to provide that service to an individual with a disability in a timely manner.

The Division is responsible for all costs necessary for eligibility determination and provision of services under an IPE. The Division must consider comparable services and benefits [34 CFR § 361.53 (c) (1)], available under any other program that does not interrupt or delay the progress of the individual toward achieving the employment outcome identified in the IPE.

The Pre-ETS interagency agreement identifies the financial responsibility of the Department of Education (DOE) to ensure that individuals who are IDEIA eligible receive a free appropriate public education (FAPE) in the least restrictive environment. A free appropriate public education means regular and special education and related services which:

- Are provided at public expense, under public supervision and direction, and without charge to the parent;

- Meet the standards established by state law, including the requirements of IDEIA Part B and the Rules, Regulations and Minimum Standards for the Governance of Tennessee Public Schools, issued by DOE;
- Include preschool, elementary school, and secondary school (including appropriate vocational, career or work experience education); and
- Are provided in conformity with an IEP.

3) [procedures for outreach to and identification of students with disabilities who need transition services.](#)

When a student who is eligible based on the Individuals with Disabilities Education Improvement Act (IDEIA) standards reaches the age of fourteen, the Individualized Education Program (IEP) team, as defined by 34 CFR § 300.344, formulates a statement of transition service needs as a component of the IEP. The TDOE provides the DSU with data regarding students who are eligible for and receiving special education services under the IDEIA to better identify the statewide needs for pre-employment transition services.

The Division's staff maintains a working relationship with special education supervisors, career and technical education supervisors, directors, secondary school guidance counselors, and LEA administrators for the purpose of providing outreach for students with disabilities and technical assistance to school personnel to assist LEAs in preparing students with disabilities for career opportunities. The Division participates in in-service training programs for LEAs, as well as in statewide special education conferences for the purpose of providing information regarding VR services. The Division also participates in and organizes local community job fairs, job clubs, attends civic club/organization meetings to inform students and parents of the purpose of the VR program, the application procedures, the eligibility requirements, and the potential scope of services that may be available.

Other activities to identify students who are potentially eligible for Pre-ETS and are meet the eligibility requirements of Section 504 include completion of student health survey forms coordinated with guidance counselors or general education teachers.

Lastly, the Division, in partnership with ten local education agencies and the Council on Developmental Disabilities, operates 13 High School Transition Project SEARCH® Sites. Those Sites are located as follows:

- BlueCross BlueShield – Hamilton County Schools
- Embassy Suites – Rutherford County Schools
- Embassy Suites – Metro Nashville Public Schools
- Le Bonheur Children's Hospital – Shelby County Schools
- Maryville College – Blount County Schools
- Methodist North Hospital – Shelby County Schools

- Parkwest Medical Center – Knox County Schools
- Sheraton Hotel – Shelby County Schools
- Tennova – Clarksville-Montgomery County Schools
- The Peabody – Shelby County Schools
- Welch College – Sumner County Schools
- West TN Healthcare – Jackson-Madison County Schools
- Wilderness in the Smokies – Sevier County Schools

Through the Project SEARCH programs, each site follows the national model for providing transition services to students. The primary objective is to secure competitive employment for people with disabilities. Project SEARCH is driven by collaboration with many community partners: a host business, an education partners, a supported employment provider, VR, and a state or local developmental disability provider. Through this nine-month internships program, people with intellectual and developmental disabilities participate in three 10-week internship rotations where they can be fully immersed into that career. In addition, the interns receive daily workplace readiness training. This increases the intern's ability to be successful in the workplace setting, learn and generalize employability and marketable work skills, and explore a variety of career paths.

The Division contracts with the Cincinnati Children's Hospital for Community Rehabilitation Provider training and assistance with site development and curriculum implementation. The Division also compensates Community Rehabilitation Providers for workplace readiness training and work-based learning experiences provided to eligible individuals per day. A match requirement is not mandated for this service.

(e) Cooperative Agreements with Private Nonprofit Organizations. Describe the way the designated State agency establishes cooperative agreements with private non-profit VR service providers.

The Division continues to maximize the use of community rehabilitation programs to provide rehabilitation services in the most integrated setting possible consistent with the informed choices of the individual.

The Division is utilizing community rehabilitation programs (CRPs) throughout the state as follows:

1. Grant Contracts

The Division has established grant contracts based on the needs of individuals with disabilities within Tennessee. These contracts serve to ensure continuation of services for individuals with disabilities, provide adequate service coverage across rural and distressed areas of Tennessee and to establish a reliable supply of needed resources for individuals with disabilities. The Division plans to continue grant contracts with private non-profit VR service providers to ensure quality services statewide, provided funding is available.

The Division has grant contracts with independent living centers across Tennessee. These services are provided in accordance with federal and state guidelines for Independent Living.

The Division also contracts with deaf centers and centers for deaf, deaf-blind, and hard of hearing individuals for the following services:

- Outreach,
- referral, and advocacy;
- interpreting services;
- client assistance;
- Assistive Technology training;
- Peer Counseling Services;
- Workshop and Seminars for sign language interpreters;
- Sign Language training;
- Technology Workshops;
- information and referral to Support Service providers;
- Activities and Events; and
- educational videos for Social Media

2. Fee-For-Service Contracts

The Division works with a statewide network of Community Rehabilitation Providers (CRPs) to provide vocational rehabilitation services to individuals with disabilities. Each provider registers with the VR Program as a service provider and competes for the privilege to serve those in the community and deliver quality services to support individuals on their employment path.

3. The Division's Service Programs

The Tennessee Rehabilitation Center (Center) at Smyrna is a state operated comprehensive residential rehabilitation facility that serves individuals with disabilities. The Center is a member of the National Consortium of State Operated Comprehensive Rehabilitation Centers. An Advisory Council is utilized to provide valuable feedback used to help guide decision making in Center operations and program development.

On July 22, 2019, TRC - Smyrna transitioned from a program-based model to a new Career and Technical Education (CTE) design to enhance the overall service delivery process and better align the Center with the WIOA Primary Indicators of Performance in the areas of Credentialing and Skills Gains. As a result of the Center's transformation, students are no longer required to participate in a specific program with designated beginning and end dates. Students now choose an Area of Study with classes offered based on an individualized schedule. On a quarterly basis, students attend day and/or evening classes and can enroll in prerequisite, required, or elective classes based on their interests, skill development needs, and Area of Study requirements based on their employment goals. All curriculums have been enriched to have a greater emphasis on work-based learning and community integration through required volunteer, practicum, and internship opportunities with business and industry. Upon completion of all

courses, students receive a certificate of completion and have the option to take an exam to receive a national credential in their Area of Study.

TRC Smyrna offers 9 Areas of Study that provide opportunities to obtain national certifications and licenses that are industry-recognized, portable, and/or stackable. The Center has completed the final year of a 3-year strategic plan that includes objectives and action steps to improve access to and increase enrollment in apprenticeship programs. A new strategic plan is currently in the works that will continue to work with one of its national partners, CVS, to develop pre-apprentice programs that could lead to registered apprenticeship certificates for TRC students. It will also continue to move the center into an educational experience for each student as they work toward their vocational goals. The following provides a brief overview of the Areas of Study and associated credentials where applicable.

Automotive Detailing Technician

The Automotive Detailing Technician Area of Study prepares students for employment in the automotive services industry. Students are trained from the I-Car curriculum which includes courses in paint correction, buffing, polishing, and refinishing of body panels. Upon completion of all courses, students can obtain a nationally recognized credential in Auto Collision and Repair.

Automotive Lubrication Technician

The Automotive Lubrication Technician Area of Study prepares students for employment in Fast Lube Businesses, Automobile Dealerships, Rental Car Outlets, Large & Small Automobile Garages, Tire Companies, and Vehicle Manufacturers. The Automotive Service Excellence (ASE) curriculum is used to teach skills in oil and filter replacement, four-wheel alignments, wheel balancing services, brake service, repair tire servicing, and light engine and transmission work. Students may take an exam to obtain certification from the National Institute for Automotive Service Excellence (ASE) upon graduation.

Business Education Technology

The Business Education Technology Area of Study introduces students to professional clerical and office opportunities. Students are trained in specific office tasks, office procedures, and skills positions in a broad range of clerical and office related positions, including receptionist, office clerk, secretary, and administrative assistant. Graduating students can obtain a national certification as a Microsoft Office Specialist and receive additional certifications through Office Proficiency Assessment & Certification (OPAC).

Certified Logistics Technician

The Certified Logistics Technician Area of Study is designed to prepare students with skills and knowledge for a career in the logistics work environment. Students will be prepared for employment with companies that have implemented a team-oriented design, safety principles, lean principles, supply

chain logistics, and sustainable practices within the manufacturing environment. Upon completion of this area, students will be able to explore job opportunities in this industry, including shipping and receiving clerk, conveyor work, and quality standards examination in warehouses and manufacturing plants. Students can obtain national certification as a Logistics Associate and an advanced Logistics Technician certification as a stackable credential through the Manufacturers Skills Standards Council (MSSC).

Certified Production Technician

The Certified Production Technician area of study will offer students an introduction to Safety, Quality, Manufacturing Operations and Maintenance Awareness, as these topics relate to employment in the manufacturing industry. This credential will prepare students for positions in manufacturing including Production Helper, Production Technician, Machine Operator and Assembler. Students who demonstrate mastery of the core competencies of advanced manufacturing production can obtain credentials as a Certified Production Technician through the Manufacturers Skills Standards Council (MSSC).

Food Service

The Food Service Area of Study will offer students an introduction to the professional food service industry. Students will be introduced to workplace safety as well as sanitation & hygiene in a food service establishment. Upon completion in this area, students will be able to display skills applicable to this area such as safety, dining area work tasks, dishwashing operation, food identification, food preparation and bakery operations. Students can obtain the certification administered by the National Restaurant Association as a ServSafe Manager.

Power Equipment

The Power Equipment Area of Study will introduce students to workplace and equipment safety on the Forklift, Stock Picker, and Power Pallet Jack. Upon completion of this Area of Study, students can obtain OSHA Forklift Certification and will be able to explore job opportunities in this industry including warehouses, lumber yards, manufacturing plants, farm supply stores, and food outlets. This AOS is only offered as a stackable certification during the Summer Short Term.

Pharmacy Technician

The Pharmacy Technician Area of Study trains students to obtain a position in a variety of customer service settings and jobs. Students will learn skills including product handling, stocking, ordering, inventory, money handling and operating point-of-sale equipment, creating displays, and customer service. This training will prepare students for positions in customer service. Students may exit the AOS at this time to obtain employment in the Customer Care field or they can continue on to train as a Pharmacy Technician. In this area, students learn to assist licensed pharmacists in providing medication, medical devices or products, and customer service to patients. Pharmacy Technicians may also perform tasks related to preparing or compounding medications, communicating with physician offices or

insurance companies, and other administrative pharmaceutical duties. Jobs can be found in retail, hospitals, mail order, and specialty pharmacies. Key skills gained include insurance verification, payment processing, inventory tracking, ordering, prescription filling, quality control, medical data entry, and coding. Upon completion of this Area of Study students can take the exam to become a Certified Pharmacy Technician (CPhT).

Certified Nursing Assistant

The Certified Nurse Assistant (C.N.A.) Area of Study will offer students the opportunity to enter nursing in an entry level position. The Certified Nurse Assistant will be introduced to areas such as medical terminology, basic nursing skills and procedures, and gain an understanding of basic patient care and needs. Upon successful completion of this area of study, students will have the opportunity to take and earn the national recognized credential of C.N.A. By achieving this credential, students will be prepared to work in a variety of healthcare settings including physicians' offices or practices, nursing homes, hospitals, home health agencies, and clinics.

In addition, TRC Smyrna offers the following services to students as needed:

- Student Academic Advisors: a part of the interdisciplinary team that will assist students in determining accommodations, selecting courses in their Area of Study and preparing schedules each quarter.
- Community Training: assist in the development and assignment of internship opportunities with employers during the student's last quarter prior to graduation.
- Employment and Placement: assist students in identifying employment opportunities and applying for jobs in their home communities.
- Vision Technology Services: assist students with visual impairments in obtaining needed foundational technology, braille and general education for the blind instruction that will prepare the student to take the next steps in their vocational training journey including but not limited to enrollment at the Tennessee Rehabilitation Center. Vision Technology Services will also provide some prep for enrollment to the Tennessee Business Enterprise (TBE) program.
- Case Management: the lead of the student's interdisciplinary team that ties all services provided at the Tennessee Rehabilitation Center together. Provides communication to all services, the VR field, student, and student natural supports. Case Management is the liaison between the student and the Vocational Rehab. Counselor during the duration of the students vocational training at TRC.
- Health Services: provides urgent medical care as needed through a Wellness Center staffed by nurses and offers physician and psychology services on a limited basis; offers health maintenance courses and behavior education for students and provides work conditioning and work hardening courses for students to prepare them for employment.

The Division also operates a network of 17 Community Tennessee Rehabilitation Centers (CTRCs) located across the state providing services to eligible individuals with significant disabilities who are seeking competitive integrated employment. The CTCRs are supported by a combination of appropriated local and Federal funds.

The Vocational Rehabilitation program has eliminated the use subminimum wage and has modernized its service delivery model to align with national best practices for achieving competitive, integrated employment outcomes for individuals with disabilities. Today, the Vocational Rehabilitation program, through its Community TRCs, offers community-based vocational rehabilitation services in partnership with local communities to meet the needs of job seeking Tennesseans with disabilities and the workforce development needs of Tennessee business and industry.

Once center-based traditional vocational rehabilitation services like vocational evaluation, career assessment, and vocational adjustment training have been transformed into community-based vocational rehabilitation services that provide a broad array of services to support individuals on their employment path. Under the new service delivery framework – Road to Independence, Success, and Employment (RISE) – the centers have become community-based vocational rehabilitation services provided in the local community with the support of the local community. Under this framework all communities have access to core vocational rehabilitation services that prepare and support individuals in going to work. And, in addition to these core services, the model offers the opportunity to customize community-based vocational rehabilitation services to the unique needs and circumstances of the community.

Road to Independence, Success, and Employment – R.I.S.E.

- Services within the INDEPENDENCE spoke consist of an array of services that include life skills assessments and basic independent living skills to support VR customers.
- Services within the SUCCESS spoke consist of services such as self-advocacy, self-determination, assistive technology assessment and assistive technology counseling.
- Services within the EMPLOYMENT spoke consist of a full array of more traditional vocational rehabilitation services that include career assessment and career readiness services to support VR customers as well as Pre-ETS services, such as post-secondary counseling, work-based learning, and self-advocacy.

The Division's Grant, Fee-For-Service Contracts, and Facility Programs are used to provide needed services such as but not limited to:

- Vocational evaluation
- Personal and vocational adjustment training
- Vocational training
- Job readiness training
- Job development and job placement
- Supported employment
- Rehabilitation technology
- Orientation and mobility
- Independent Living services
- Activities of daily living
- Trial work experiences
- Pre-Employment Transition Services

The VR Program is continuously seeking new partnerships with businesses and nonprofit organizations within the community to help develop, promote, and employ individuals with disabilities and transform the lives of Tennesseans.

(f) **Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.**

Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

The Division has interagency arrangements and coordination with the following entities for the provision of supported employment services and extended services:

- The Department of Intellectual and Developmental Disabilities refers individuals with intellectual and developmental disabilities (DIDD) to the Vocational Rehabilitation program for Supported Employment Services.
- The Department of Mental Health and Substance Abuse Services (TDMHSAS) works with the Division to employ an evidence based Individual Placement and Support (IPS) model of supported employment for individuals with mental illness and substance related disorders.
- The Tennessee Employment Consortium, which is an independent association of community rehabilitation providers and state agencies developed jointly by the Division, the Department of Intellectual and Developmental Disabilities, and the Tennessee Council on Developmental Disabilities, was established to provide a forum for all stakeholders to review and discuss state policies and share best practices.
- University of Tennessee, Center for Literacy Education and Employment provides staff training, professional development, and consultation services for community supported employment service providers.
- Tennessee Department of Labor and Workforce Development works with the Division to share and report all employer related activities provided under the Workforce Innovation and Opportunity Act, which also requires services be provided to numerous target groups that have barriers to employment, including persons with disabilities and employers who hire these individuals. The Division is exploring ways to further its partnership with the Tennessee Department of Labor and Workforce Development to provide customized employment services through their system of Career Centers on behalf of VR clients, business and industry.
- Tennessee Division of Health Care Finance and Administration, Division of TennCare (TennCare) partners with the Division for the provision of Supported Employment services for individuals enrolled in Employment and Community First CHOICES. ECF CHOICES serves individuals with intellectual and developmental disabilities who are receiving home and community-based programs under the Medicaid Long Term Support Services.
- The Tennessee Department of Education (DOE) for the provision of Pre-Employment Transition Services, transition services, and other VR services provided by VR to students with disabilities in order to support an efficient transition from secondary school to post-school employment and related activities leading to competitive integrated employment.
- The Division is a party to the Interagency agreement between DOE, DIDD, the Tennessee Department of Health, TDMHSAS, the Tennessee Department of Correction, and TennCare to fulfill the requirements of Part B and Part C of the Individuals with Disabilities Education Act (IDEA). The partner agencies strive to ensure that individuals and youth with disabilities are prepared for competitive integrated employment with access to necessary support services.

The Division has encouraged the establishment and development of Community Rehabilitation Providers (CRPs) to improve and expand services through grant and fee-for-service contracts in a joint effort of improving and expanding supported employment and extended services for individuals with disabilities. The Division currently has 89 active registered CRPs for supported employment services. The Division continues its' efforts to increase Supported Employment service providers and anticipates the numbers of providers will increase. VR is actively pursuing several other providers for underserved areas across the state.

(g) **Coordination with Employers.** Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities to facilitate the provision of:

1) VR services; and

The Vocational Rehabilitation Business Service Unit (BSU) works with employers to promote competitive integrated work opportunities and career exploration for customers through job search and placement services, combined service provision with WIOA core partners and stakeholders, and facilitation of work-based learning opportunities and employer-based training and employment programming.

VR customers can work with a Business Employment Consultant (BEC) from the BSU to explore career opportunities aligning with their occupational goals and desired geographical location of residence. Together, the BEC and VR customer can search for local employment opportunities of interest, apply for opportunities, conduct interview preparation, and execute final placement. The success of BECs is measured by their successful service delivery to enhance competitive integrated employment outcomes for customers.

The BSU also provides services directly to the business community, focusing on the needs of Tennessee employers, large and small. As employers across the state seek to recruit and retain individuals with disabilities, the BSU is a resource for consultation and assistance regarding services such as: Work Opportunity Tax Credit, Person-Centered Trainings, Workplace Accessibility, Workplace Accommodations, and more. In 2021, 9 BECs across the state became certified Windmills training and more than 25 Windmills trainings have been provided. If a Tennessee employer is facing a challenge regarding the recruitment and retention of individuals with disabilities to their workforce, the BSU will assist in developing customer-centered solutions for that business.

Vocational Rehabilitation's Business Service Unit works with partners from state agencies such as the Department of Intellectual and Developmental Disabilities, Department of Labor and Workforce Development, Department of Economic and Community Development, and Department of Corrections to align efforts in serving business customers and agency customers. Through participation in the Department of Labor and Workforce Development's local Business Service Teams, the VR Business Service Unit's BECs provide education and outreach services to employers offering competitive integrated work environments, enabling VR customers to have an expanded horizon of opportunity with

Tennessee employers. Last, the VR BSU is leveraged for developing work-based learning sites across the state to promote career exploration for individuals with disabilities receiving services through the Division. Employer-based training and employment programs across the state enable customers to engage in meaningful work in a variety of industries through an integrated setting where compensation and benefit eligibility for full-time employees is competitive with the local labor market and equally available for VR customers.

The Tennessee Rehabilitation Center (TRC) – Smyrna continues to develop new partnerships and maintains the relationships with its current partners. This ensures that a work-based training experience is available for students in all Areas of Study. The Center currently has 25 agreements with employers to provide internship opportunities and new agreements are being signed on a regular basis. TRC Smyrna continues to offer customized training in partnership with Schwan Cosmetics and CVS Health and maintains a Business Employment Consultant on campus to assist students in job placement upon graduation. To ensure a greater focus is placed on building employer relationships in the future, a position at TRC Smyrna was designated in July 2019 to develop new internship opportunities to meet the needs of the increasing student enrollment. This position also conducts follow up to ensure that students are applying skills learned and employers are evaluating the students and the overall internship process. In addition, employers interested in offering internships and/or employment to TRC students are always invited to tour the campus, meet the instructors, and observe classroom instruction prior to signing a partnership agreement.

As part of a 3-year strategic planning process, a survey was conducted using face-to-face interviews with all partner employers and several non-participating employers in Rutherford County. The employers provided valuable input regarding the courses that best suit their needs, skills students must be able to demonstrate for success in their company, and industry credentials that would better prepare students for employment. The respondents also indicated that the existing 2-week internship did not provide ample time for students to apply all they've learned or allow the employers to fully evaluate their newly developed skills. It was recommended that both the length of the internships and hours per day on site be extended. To address the employers' recommendations, new courses were created, national credentials were included in all Areas of Study, and all internships were extended to the length of a term with the student attending 4 days per week for the hours specified by the internship partner. TRC Smyrna will continue to conduct these in-person surveys to assist in ongoing planning and program development during the final year of the Center's Strategic Plan.

Seventeen community TRCs (CTRCs) strategically located throughout the state provide opportunities for engagement with business to identify competitive integrated employment and career exploration opportunities unique to the local communities where the centers are located. CTRC services include training, career assessment, and career readiness to prepare individuals for employment. CTRC staff engage with local business to educate on the benefits of hiring people with disabilities, the services available by the center, and to secure training opportunities for VR customers. As the CTRCs move from facility-based training to community-based training, there are additional opportunities to engage with business which include internships, externships, tours to teach customers about local employers and the skills needed for their jobs, job shadowing and mentoring. Additionally, each CTRC has a local Advisory Board which consists of members of the local community (business leaders, representatives from the

local education agency, civic leaders, non-profit members etc.) The area managers can leverage these relationships to spread the word about VR, and the training and support services available in the CTRCs that lead to competitive integrated employment for VR customers.

2) transition services, including pre-employment transition services, for students and youth with disabilities.

As noted above, the Division is working with employers to provide transition services, including pre-employment transition services for students and youth with disabilities. In addition to the work done through coordination with community rehabilitation providers, the division works with employers through its partnership with the Business Services Unit, which helps Pre-ETS staff and students coordinate with employers by utilizing business relationships that the Business Solutions Partners have developed in order to achieve specific goals reliant on partnerships with the business community. Business Solutions Partners serve as a liaison for the Pre-ETS teams as they seek to identify opportunities with the business community such as: Career-Exploration Initiatives, Work-Based Learning Opportunities, Community-Based Training Opportunities, business representation on local and state advisory boards, and more. Business Solutions Partners serve as a resource for the VR team to access the opportunities that exist within the business community for serving youth and adults with disabilities at varying stages of their customer journey to long-term competitive integrated employment.

As previously mentioned, the Division works with employers through Transition School to Work grants, and the Project SEARCH® sites. In partnership with ten local education agencies and the Council on Developmental Disabilities, the Division operates 13 High School Transition Project SEARCH® Sites through local employers. Those employers include:

- BlueCross BlueShield – Hamilton County Schools
- Embassy Suites – Rutherford County Schools
- Embassy Suites – Metro Nashville Public Schools
- Le Bonheur Children’s Hospital – Shelby County Schools
- Maryville College – Blount County Schools
- Methodist North Hospital – Shelby County Schools
- Parkwest Medical Center – Knox County Schools
- Sheraton Hotel – Shelby County Schools
- Tennova – Clarksville-Montgomery County Schools
- The Peabody – Shelby County Schools
- Welch College – Sumner County Schools
- West TN Healthcare – Jackson-Madison County Schools
- Wilderness in the Smokies – Sevier County Schools

Since September 2015 through May 2021, a total of 382 students have enrolled in the Project SEARCH® Program. The Project SEARCH® Program has a success rate of 92%, with 353 out of 382 students completing the program in Tennessee to date. Tennessee currently has 9 Community Rehabilitation Providers participating as Project SEARCH® Providers. The program operates from 17 different business

sites across Tennessee and during the 2021-12 school year has 65 interns participating in the program. Project SEARCH® has proven to be one of TN VR's more successful job training programs, with a >75% employment rate.

(h) **Interagency Cooperation.** Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

- 1) the State Medicaid plan under title XIX of the Social Security Act;

As noted in the previous sections, the Division maintains memoranda of understanding (MOU) with each of the state agencies listed above.

The Division's MOU with the State Medicaid Agency, TennCare outlines the coordination of the provision of services for individuals enrolled in Employment and Community First CHOICES. ECF CHOICES serves individuals with intellectual and developmental disabilities who are receiving home and community-based programs under Medicaid Long Term Services and Supports. Beginning in July 2016, Tennessee, through the ECF CHOICES program, became the first state in the country to develop and implement an integrated, home and community-based services program, aligning incentives toward promoting and supporting integrated, competitive employment and independent living as the first and preferred option for individuals with intellectual and developmental disabilities.

The Division's MOU with DIDD governs the referral individuals with intellectual and developmental disabilities (DIDD) to the Vocational Rehabilitation program.

The Division's MOU with TDMHSAS works with the Division to employ an evidence based Individual Placement and Support (IPS) model of supported employment for individuals with mental illness and substance related disorders. IPS has become a promising SE program for individuals with mental illness who may also have other diagnoses. As noted in other sections of the plan the Division is expanding its partnership with TDMHSAS to serve even more individuals in the coming years.

In addition to the individual MOUs with each of the state agencies, Tennessee is an Employment First State. The state operates an active Employment First Taskforce that includes all the agencies listed above and several others. The Employment First Taskforce's mission is to create and expand employment opportunities for all Tennesseans with disabilities and its vision is that people with disabilities have equal access to employment opportunities. The goals of the taskforce are to:

- Align service delivery systems and strengthen coordination to increase employment opportunities for Tennesseans with disabilities
- Build shared community commitment to Employment First

- Increase the number of employers that hire people with disabilities
- Make Tennessee state government a model employer of people with disabilities
- Prepare students for employment and post-secondary success

- 2) the State agency responsible for providing services for individuals with developmental disabilities; and

Response provided in section h.1 above.

- 3) the State agency responsible for providing mental health services.

Response provided in section h.1 above

(i) **Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development**. Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

- 1) **Data System on Personnel and Personnel Development**
- (A) **Qualified Personnel Needs**. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:
- the number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

Vocational Rehabilitation currently employs 354 staff. Of these 354 staff members, 137 provide direct customer services. These positions are broken down by job category and position classification in the table below.

Current TN VR Personnel

Job Category	Job Classifications	Current # of Staff Employed
Administration	Program Director, Rehab Superintendent	18
Clerical	Administrative Services Assistant, Administrative Assistant, Secretary	60
Rehabilitation Assistants	Rehabilitation Assistant	11
Supervisors	Field Supervisor, Program Manager, Program Supervisor, Rehab Training Center Manager, Facilities Manager, Custodial Supervisor, Rehab Center Manager	56
Support	Building Maintenance, Custodial Worker, Program Coordinator, Program Specialist, Orientation & Mobility Specialist, Vocational Rehabilitation Safety Coordinator	31
Instructor	Rehabilitation Instructor, Vocational Instructor	15
VR Direct Client Services	Vocational Rehabilitation Counselor Masters, Vocational Rehabilitation Support Coordinator, Pre-Employment Transition Specialist, Vocational Rehabilitation Career Training Coordinator, Vocational Rehabilitation Career Training Specialist, Vocational Rehabilitation Case Manager, Vocational Rehabilitation Evaluator, Vocational Trainer	137
Medical	Licensed Practical Nurse, Nurse's Assistant, Occupational Therapy Assistant, Physical Therapist, Psychological Examiner, Recreation Therapist, Registered Nurse	13
BEP Specialist/Consultant	Business Employment Consultant, Business Employment Supervisor	13

- the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

The Division currently has 452 allocated positions. Of these 452 positions, 98 are currently vacant. Out of the 452 allocated positions, 207 positions provide direct customer services. 54 of the direct customer services positions are currently vacant. In 2021, Tennessee's VR program began to modernize its organizational structure to meet the demands of the VR program and create a career pathway to attract and retain qualified personnel through competitive wages and career advancement opportunities. As a result, new position classifications were created. Three of those new classifications include the

Vocational Rehabilitation Support Coordinator, Vocational Rehabilitation Career Training Coordinator, and the Vocational Rehabilitation Career Training Specialist. These new classifications are responsible for providing direct services to VR customers and account for 42 of the 54 vacancies in this job category. As of January 2022, VR is still actively recruiting for these 3 new positions and therefore, is still experiencing a high rate of vacancy. Interviews are currently underway and based on initial interest in the positions, VR expects the vacancy rate to dwindle dramatically by March 2022.

These allocated positions reflect the estimated number of personnel needed by TN VR to provide services. The table below provides a breakdown by job category and indicates the current number of vacancies.

TN VR Personnel Needed by Category

Job Category	# of Positions Allocated & Needed	Current # of Vacancies
Administration	18	0
Clerical	60	2
Rehabilitation Assistants	24	13
Supervisors	56	2
Support	30	11
Instructor	21	6
VR Direct Client Services	207	54
Medical	19	6
BEP Specialist/Consultant	17	4

The Division currently anticipates needing the same number of positions in each of the above job categories to adequately provide services to those individuals needing services across the state. Additionally, the Division is in a period of transformation, identifying areas where we can better utilize staff and resources to make service delivery more efficient and effective for both VR participants and staff.

- projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Response provided in section i.1.A.i. above.

- (B) **Personnel Development.** Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

- a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

In Tennessee, the University of Memphis, located in Memphis, TN is the only school that has the Council on Rehabilitation Education (CORE) certified program offering a master's degree in Rehabilitation Counseling.

The Master's Degree in Rehabilitation Counseling program at the University of Tennessee located in Knoxville, TN ended in 2018.

- the number of students enrolled at each of those institutions, broken down by type of program; and

The University of Memphis currently has 16 graduate students in their program. Of these students ten (10) are sponsored by RSA. Approximately 70% of the RSA Scholars are from underrepresented groups. None of these students are currently employed by the Division. Of the 16 graduate students, nine (9) are from underrepresented groups (racial or ethnic minority) and two (2) identified themselves as a person with a disability.

Two (4) Masters VR Counselors plan to enroll in graduate courses for 2022-23. One (1) at Utah State, one (1) Fort Valley State, one (1) University of Kentucky, and one (1) at Missouri Southern State University.

Two RSA Scholars graduated with a master's degree in Rehabilitation Counseling during the 2020-2021 academic year and two RSA Scholars graduated in December 2021.

- the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

TN – VR-University of Memphis – Rehabilitation Counseling program

Institutions	University of Memphis
Students Enrolled as of December 2021	16
Employees sponsored by agency and/or RSA	0
Graduates sponsored by agency and/or RSA	10
Graduates from the previous year	3

The Division currently has three (3) Masters VR Counselors enrolled in on-line courses to meet CRCC's requirements to sit for the CRC exam. One (1) is at Utah State University, one (1) at University of Alabama and one (1) at University of Memphis.

The Division currently has 32 Masters VR Counselors who have completed all requirements to sit for the CRC exam.

The Division currently has 16 Masters VR Counselors who hold CRC certification.

- 2) [Plan for Recruitment, Preparation and Retention of Qualified Personnel](#). Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

As noted in previous sections, Talent Management is a strategic priority for the VR Program. The Division of Rehabilitation Services is committed to ensuring that the VR program is staffed appropriately to deliver much needed services to the citizens of Tennessee, as well as ensuring that our staff have the resources and support that they need to perform their job duties effectively and efficiently. Through our actions, we are aiming to:

- Advance a culture of high performance through professional development and accountability;
- Recruit, develop, retain, and recognize quality employees and equip them to deliver high quality service through continuous coaching and training; and
- Sustain efforts through staff retention and thoughtful succession planning.

The Department's People Operations division assists with recruiting, onboarding, developing, and retaining personnel. The division recently creating a dedicated talent acquisition team to enhance the ability to recruit qualified personnel. Progress includes the development of a market appropriate standard job posting template and significant expansion of our recruiting and advertising sources, such as online job boards, social media, and industry-specific sites. This process also provides support to hiring managers to ensure job postings accurately reflect relevant duties and responsibilities and language that will attract both active and passive job seekers. In addition, in 2020, the State of Tennessee implemented an updated applicant tracking system to enhance recruiting efforts.

The Division remains diligent in retention strategies for qualified staff. VR Counselors are given opportunities to attend conferences, trainings, and events in recognition of their work, dedication, and commitment to assisting individuals with disabilities in achieving their employment goals. The Department also conducts consistent employee engagement surveys to determine levels of satisfaction and opportunities for organizational solutions to address employee retention.

Additionally, Division leadership is in the middle an update and re-design of counselor training, general staff on-boarding and other professional development opportunities for staff on an ongoing basis. These efforts will be continued throughout 2022.

In 2021, the Division of Rehabilitation Services assessed and evaluated the Division's staffing, including a review of position classification and compensation for alignment with the roles and responsibilities of a modernized, community-based vocational rehabilitation program. This resulted in the creation of new job classifications, including an entry-level non Master's level staff position to assist our Master's level counselors with their workload. This new job classification will attract individuals who are interested in the field of vocational rehabilitation and help to create a talent pipeline to the Counselor position or other positions within the Division.

The cumulative outcomes of the efforts mentioned will significantly support improved customer interactions and outcomes.

- 3) Personnel Standards. Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

- (A) standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

All VR Counselor positions are filled at the master's degree level. The position qualifications require graduation from an accredited four-year college or university with a master's degree in Rehabilitation Counseling OR Graduation from an accredited four-year college or university with a master's or completion of a doctoral program in a related field of study with course content that emphasizes rehabilitation, counseling, disability, therapy, health, employment, wellness, or human development. If the degree is in a related field of study, the employee must, within 90 days of hire, enroll, at their own expense, in an approved educational plan that will result in the completion of the following courses: Professional Orientation & Ethics in Rehabilitation Counseling, Medical & Psychosocial Aspects of Disabilities, Theories & Techniques of Counseling within thirty-six months from the date of hire.

- (B) the establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

As stated above, VR Counselors are required to have a master's degree in Vocational Rehabilitation or a related field (with additional coursework required). Onboarding for new staff involves meeting in person or online with leadership. community rehabilitation providers in their area and their local American Job Centers (AJCs), as well as the directors from programs such as Business Services, Transition, Policy,

Contracts and Assistive Technology. Initial on-boarding occurs immediately with the new hire and their immediate supervisor.

The Division's New Counselor Institute is a six (6) week blended learning opportunity that combines traditional classroom instruction with independent distance learning, hands-on application, job shadowing, and observation. New Counselor Institute is offered several times a year based on actual hiring needs.

In addition to the formal instruction offered as part on-boarding and hiring, training is offered regularly through unit and regional meetings. The division's Policy Specialists attend regional meetings at least quarterly to provide policy updates and other training opportunities. VR Counselors and Supervisors are encouraged to request ad hoc training as areas of interest or advances are identified. Policy Specialists also conduct webinars and record other on-line training opportunities for VR staff to maintain current knowledge on best practices. The Division contracts with the VR Development Group (VRDG) to provide a variety of online module trainings including disability specific topics, ethics, and other topics relevant to the field of rehabilitation. The Business Services Unit provides information at quarterly regional meetings pertaining to labor force needs and the needs of individuals with disabilities entering employment. The Division also works closely with the AJCs and DOL to ensure accurate, up-to date information is shared with staff.

An annual training event for staff is the ResourceABILITY Fair held each October in conjunction with disability employment awareness month. This event is hosted in partnership with the state's AT Act Program, the Tennessee Technology Access Program (TTAP), and includes training, product demonstrations by AT vendors, highlights of VR success stories, and networking with employers.

- 4) Staff Development. Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

- (A) a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

The Department of Human Services, People Operations division provides focused support driven by agency strategy to ensure organizational ability to attract, recruit, select, develop, engage, and retain staff throughout the employee life cycle. The agency has made significant investments in the development of its Talent in building and developing organizational capacity to meet current and future business and customer needs.

People Operations provides staff development, leadership development and training for DHS employees. DHS has invested an average of 45 hours of learning per employee annually. People Operations works in a consultative manner with the VR Program to determine learning, skill

development and relevant competency-based needs of the division. Training needs are identified through a variety of channels including program and policy updates, advances in research and best practice, individual performance evaluations, quality assurance reviews and overall program performance metrics. People Operations has dedicated staff to provide support for the VR Program and works in conjunction with the VR Program in the development of training necessary to ensure effective, outcome driven results. The team works consistently to provide standard learning opportunities to support effective service delivery.

In working with the VR Program leadership, when new learning needs are determined, the People Operations Learning & Development team has in-depth discussions and provides an assessment tool for leaders to provide feedback on the learning need, expected outcomes, and program impact. The team assesses this information, engages in additional exploratory conversations with leadership before creation of an outline for proposed learning. Once an outline has been approved by both field and divisional leadership, the People Operations Learning & Development team creates curriculum learning objectives and a proposed syllabus. With divisional endorsement, full curriculum development begins. The final curriculum is reviewed by the curriculum review team before divisional review. Once completed final review and revisions are provided by Rehabilitation Services. The design team provides learning design ideas that drive innovation and lend themselves to an improved learning experience for DHS employees. Each VR Program employee can evaluate each learning opportunity and the survey results are used for ongoing curriculum improvement.

People Operations provides performance management support to all DHS employees in alignment with the goals and priorities established by the Governor and the Commissioner of DHS. Ongoing refresher performance management training is provided to managers and employees to ensure an accurate and consistent performance management process.

Learning Strategies:

People Operations provides a team consisting of one director and 3 Training Officers who are dedicated to the learning needs of the Rehabilitation Services Division. This team has a key objective of facilitating learning around policy, culture, job responsibilities and systems knowledge.

In 2021, the People Operations Learning & Development team began development of a redesigned new counselor training. All new counselors participate in the Division of Rehabilitation Services' redesigned CORE Learning Modules. In addition, the People Operations Learning & Development team provides training to new and current employees on the new Aware system.

The Edison Enterprise Learning Management (ELM) is in place and allows documenting available courses, learner enrollment, and learner overall participation in various classes. Each learner has a "My Learning" page that documents all sessions of training (classroom or online) attended and completed. The system also allows for cumulative or individual reporting on various aspects of learning completed for the division and the agency.

In addition to the training offered by the Division, the VR Program contracted for online course system offered by the VR Development Group (VRDG). All courses are designed for the field of VR. VRDG is the only organization offering accessible, interactive multimedia courses in the VR field. VRDG information is continuously updated and includes changes from WIOA and the CRC Code of Ethics. Course topics

include: Effectively Managing VR Caseloads, Autism Spectrum Disorders and Employment, Introduction to VR, Comprehensive Assessment, and Job Development and Employment Acquisition (to name a few). These trainings are available 24/7. Supervisors choose the sessions for their staff. At the end of each session there is a quiz to check for learning and comprehension.

- (B) [procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.](#)

TN VR is a member of several national and state professional organizations and associations including the Council of State Administrators of Vocational Rehabilitation (CSAVR) and the National Council of State Administrator for the Blind (NCSAB). In addition to participation as a state, many of our staff maintain individual memberships in professional organizations and associations. These memberships provide access to a network of professionals across the state and nationwide that regularly distribute research and resources on best practices and advances in the field through conferences, training, listservs, and publications.

TN VR leverages the resources and expertise of the training and technical assistance provided to state VR agencies through the training and technical assistance centers funded by the Rehabilitation Services Administration including the National Technical Assistance Center on Transition (NTACT), Workforce Innovation Technical Assistance Center (WINTAC), Rehabilitation Training and Technical Assistance Center for Program Evaluation and Quality Assurance (PEQA), Vocational Rehabilitation Technical Assistance Center for Youth with Disabilities (Y-TAC), and the Job-Driven Vocational Rehabilitation Technical Assistance Center (JDVRTAC). TN VR staff receive email notifications of new research, resources, training, and webinars and regularly participate in these opportunities.

Staff have opportunities throughout the year to attend conferences and training relating to the field of vocational rehabilitation. Examples include the Tennessee Disability Mega Conference, ResourceABILITY Fair, Tennessee's Passport to the Future sponsored by Vanderbilt University and Transition Tennessee. At the national and regional level, Tennessee regularly has a presence at CSAVR, NCSAB, PEQA, Project SEARCH, Individual Placement and Supports Learning Community, Get Aware Live, and Southeast Regional Institute on Deafness (SERID). The staff selected to attend these events are required to bring back information and present to their colleagues.

- 5) [Personnel to Address Individual Communication Needs.](#) Describe how the designated State unit has personnel or obtains the services of other individuals who can communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

The Tennessee Department of Human Services (TDHS) will take reasonable steps to ensure that persons with Limited English Proficiency have meaningful access and an equal opportunity to inquire, apply for

and participate in Agency-offered services, including VR services, activities, programs and other benefits. All interpreters, translators, and other aids needed to comply with this policy shall be provided without cost to the person seeking services.

The Division of Rehabilitation Services has policies and procedures to ensure that it includes among its personnel, or has readily available, the services of (1) Individuals able to communicate in the native languages of applicants and eligible individuals who have limited English proficiency through Avaza Language Services, Linguistica International, or TransPerfect; and (2) Individuals able to communicate with applicants or eligible individuals in appropriate modes of communication.

During staff orientation, New Counselor Training, annual Title VI training and other training activities, Division staff members are informed of specific procedures to be followed to ensure effective communication with limited English-speaking individuals. Telephonic translation services are available through Avaza Language Services, Linguistica International, or TransPerfect. The Tennessee Language Center is also available for written translation and in person interpretation. All regions have received training for all staff in the use of these services.

The Division continues to recognize its responsibility for employing or obtaining the services of sign language interpreters, which fall within the definition of appropriate modes of communication in (34 CFR § 361.5(b) (5)), to the extent necessary to meet the communication needs of individuals who are Deaf, Hard of Hearing or Deaf-Blind. The Division's policy addresses the (1) significance of such services, (2) the selection of service providers, (3) the scheduling and payment for services, and (4) an evaluation process for such services.

6) Coordination of Personnel Development Under the Individuals with Disabilities Education Act. As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

In 2015, the TDOE partnered with Vanderbilt University to create an online and in-person professional development system called Transition Tennessee (www.transitiontn.org). Transition Tennessee was originally intended to be a one-stop shop for educators to have immediate access to all things related to transition planning in the school system through an online portal. It began with an initial set of online professional development courses and expanded into establishing regional communities of practice, local technical assistance sites, monthly webcasts, and much more. The courses offered under the educator blueprint are:

- Guiding Principles
- Age-Appropriate Transition Assessments
- Developing a High-Quality Transition Plan
- Pathways to Employment
- Pathways to Community Life

- Pathways to Self-Determination
- Pathways to Postsecondary Education
- Supports and Partnerships

This new online resource was presented across the state to teachers, but also to vocational rehabilitation staff. To continue and expand the State's collective impact, VR also entered into a partnership with Transition Tennessee to create a Pre-ETS Blueprint portal that would also be housed on www.transitionTN.org. As of Jan. 2022, there are eight courses available within the Pre-ETS Blueprint and two more being developed.

- Power of Early Work Experiences
- An Overview of WIOA and Pre-ETS
- Connecting with Employers and Families
- Instruction in Self-Advocacy
- Work-Based Learning
- Job Exploration Counseling
- Developing Strong Partnerships
- Strategies for Effective Instruction
- Workplace Readiness Training (2022)
- Counseling on Postsecondary Education Opportunities (2022)

An ever-evolving student portal has also been created where students can receive free training on tips for going to work or continuing their education. This student can also be leveraged by providers to be used as an instructional tool, complete with resources, handout, notes, and guided lessons.

This partnership between the TDOE, VR, and Vanderbilt to create and expand Transition Tennessee has also resulted in hosting a pre-conference in addition to the TDOE's Partners in Education Conference. The pre-conference is called Passport to the Future and has reached capacity of 450 during the first two years and over 500 in January of 2020. Passport to the Future brings together both education and VR staff for the sole purpose of improving the knowledge, skills, and abilities for the partners who help build a seamless pathway to postsecondary. A virtual option was also provided in 2021, but there is not an option for a Passport to the Future conference in 2022 as part of the TDOEs' Partners in Education Conference, as the conference is no longer occurring. More information about Passport to the Future or other training opportunities can be found here: <https://transitiontn.org/vr/conference/>.

Figure 12: TN - VR Transition Services: Collective Impact

(j) Statewide Assessment.

- 1) Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:

(A) with the most significant disabilities, including their need for supported employment services

The information below details the results of the last comprehensive statewide needs assessment (CSNA) that the TN VR program conducted in 2019. The state is in the middle of conducting a new CSNA that will be complete by September 2022. Information collected through the 2022 CSNA will be used in future updates to the statewide plan.

The Rehabilitation Act of 1973, as amended (Act) calls for periodic comprehensive statewide needs assessments to be conducted jointly by each state's vocational rehabilitation (VR) agency and State Rehabilitation Council (SRC) to inform the State Plan. The Act is specific regarding areas that a needs assessment should address. In addition to the overall need for rehabilitation services in the state, the Act focuses on several VR subpopulations and services: individuals with most significant disabilities, including those in need of supported employment; unserved and underserved individuals, including minorities; individuals served by other parts of the statewide workforce investment employment system; and establishment, development, or improvement of community rehabilitation programs (CRPs).

In 2019, in collaboration with the State Rehabilitation Council and Transition TN, the vocational rehabilitation program conducted several assessments to capture a comprehensive picture of the state's needs. VR customers and their caregivers, Community Rehabilitation Providers (CRPs), VR staff, stakeholders, WIOA partners, Pre-ETS providers, educators and parents of students with disabilities all provided valuable feedback on the strengths and opportunities for vocational rehabilitation in Tennessee.

Trends that Tennessee are experiencing closely follow national trends related to assisting individuals with disabilities find employment opportunities in a competitive and integrated setting.

Overall, information collected in the 2019 needs assessment reveals that individuals who interact with the VR program believe that VR provides beneficial and much-needed services to Tennesseans who need it. However, that same information also illustrates that the program has opportunities to improve and strengthen service delivery, internal and external communication, and efforts to train and retain VR's most important asset – the staff that work day in and day out to help connect Tennesseans with disabilities to competitive and integrated employment opportunities.

The information that follows in this section highlights data collected in the assessment as it relates to the VR service needs of those with the most significant disabilities, including their need for supported employment services; those who are minorities; those who have been unserved or underserved by the VR program; those who have been served through other components of the statewide workforce development system; and those who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

As part of the CSNA, respondents across all surveys, other than the WIOA partners, were asked which VR services they believe most help individuals prepare for employment. Across the board, top choices included job readiness, job placement, and supported employment. Customers and caregivers ranked the option of “Other Services” highly, though as highlighted in the below figure, job placement assistance was the service that most respondents stated that they receive.

Figure 13: TN - Most Helpful VR Service

As the below figure depicts, regardless of service received, 65% of respondents to the VR Customers and Caregivers survey believed that the services offered by VR met their needs. However, as the bottom figure illustrates, there was a slight difference when respondents were asked if they believed that their participation in the VR program left them feeling more confident in their ability to work in the community. Only 60% of respondents agreed that they were more confident in their ability.

Figure 14: TN VR Services Met Needs

Figure 15: TN VR Services Increased Confidence

The CSNA used data obtained in the ACS five-year survey (2013-2017) to determine accurate information about the racial makeup of citizens in the state of Tennessee. Approximately 78% of Tennesseans identify as White, followed by approximately 17% of Tennesseans who identify as Black/African American. American Indian/Alaskan Native (AI/AN), Asian, Native Hawaiian/Other Pacific Islander (NH/PI), some other race, or a combination of multiple races rounds out the racial profiles of Tennesseans surveyed.

Figure 16: TN VR Cases by Race

Figure 17: TN VR Closed Cases by Race

Moving beyond the racial and ethnic profiles of VR customers, the VR needs assessment identified certain populations thought to be chronically unserved and underserved by the VR program. The needs assessment provided respondents with examples of “unserved” (defined as individuals eligible for VR services but have not yet received VR services) or “underserved” (defined as individuals that have not traditionally received equal access to benefits of VR services, such as racial or ethnic minorities) populations as defined by the Rehabilitation Services Administration (RSA) and asked them to identify whether they thought certain populations fit into either category. Additionally, respondents were asked to elaborate on what they believed to be the unmet needs of these groups and to identify ways that VR could reach out to these populations. Below is a summary of VR’s findings.

Overall, survey respondents identified immigrants, American Indian or Native American, Asian or Pacific Islander, and the Offender Reentry populations as those most “unserved” in Tennessee.

On a national level, data suggests that regardless of race, individuals with a disability are less likely to be employed. In 2017, Whites and Blacks/African Americans had a higher rate of disability than Asians or Hispanics. At the same time, regardless of disability status, Whites and Hispanics were more likely to be employed than Blacks and Asians.

In Tennessee in 2017, the prevalence of disability for working-age people (ages 21 to 64) when broken down by race found the following results: Individuals identifying as Native American reported the highest rate of disability (29.1%), followed by White (13.9%), Black/African American (13.7%), Some other race(s) (11.6%), and Asian (5.7%). This does not mean that these individuals were employed, but rather are of the age to participate in the labor force.

Tennessee state law requires the Division of Rehabilitation Services to submit a Title VI Implementation Plan to the Tennessee Human Rights Commission annually. In order to submit the plan, the division compiles racial and ethnic statistical data regarding the Vocational Rehabilitation program. The tables in the below figures identify the number of active and closed cases, as well as the percentage of all cases they represent, broken down by race that VR assisted with over the last three years.

Figure 18: TN VR Chronically Unserved Populations

Additionally, survey respondents identified rural residents, limited English proficiency, Hispanic or Latino, Offender Reentry, and Individuals with substance abuse as those most “underserved” in Tennessee.

Figure 19: TN VR Chronically Underserved Populations

Populations that were identified through the survey as “potentially served” included: individuals with developmental disabilities, individuals with autism spectrum disorder, individuals who are blind or visually impaired, veterans and inner-city residents.

Additionally, VR staff noted several populations that VR should investigate: LGBT, retention service cases, individuals with worker’s compensation cases, individuals with Traumatic brain injury, individuals with Spinal cord injury, individuals who are victims of crimes or domestic abuse, and individuals who have dual diagnosis.

Figure 20: TN VR Potentially Served Populations

When asked what they felt the unmet needs of those populations identified as “unserved” or “underserved” were, survey respondents indicated that knowledge of VR services, transportation, and awareness of opportunities were among the top needs identified.

Figure 21: TN VR Unmet Needs of Unserved and Underserved Populations

Finally, when asked for ideas on how to better reach these individuals, survey responses were evenly distributed among the need to work with existing partners and to establish partnerships with local community centers, libraries, faith communities, or any place where the identified populations might regularly gather to meet these populations where they are.

Figure 22: TN VR Outreach Opportunities

The last component of the 2019 needs assessment focused on youth and/or students with disabilities and their needs for potential Pre-Employment Transition Services (Pre-ETS). Tennessee’s goals for Pre-ETS are to:

- Ensure students have quality employment outcomes which are not “just a job,” but a career path
- Broaden the scope and range of services to meet the needs of individual students within Local Education Agencies (LEAs)
- Work collaboratively with schools to determine the needs of students

Pre-ETS services address five areas, including job exploration counseling, work-based learning, counseling on post-secondary enrollment opportunities, workplace readiness training on social and independent living skills, and instruction in self-advocacy.

Since 2016, the Division has focused on expanding its provision of Pre-ETS services statewide. Currently, the division has 23 Pre-ETS Specialists and 3 Field Supervisors and is continuing to grow as needs are identified. In August 2019, the division was excited to announce the hiring of a new transition director, Blake Shearer, who will be responsible for leading the division’s transition programs for students and youth with disabilities. Blake comes from the Tennessee Department of Education, where he dedicated himself to establishing partnerships between schools, state agencies, and other stakeholders to increase employment outcomes for students with different abilities. His expertise in the field and his collaborative nature will only help to continue increasing the presence of Pre-ETS in Tennessee.

The growth in the utilization of Pre-ETS services has increased exponentially over the past three years. During the 2016-17 fiscal year, 1,964 pre-ETS services were provided to students across the state. That increased to more than 10,000 in the 2017-2018 school year. During the 2018-2019 school year, 42,616 pre-ETS were delivered, representing a 300 percent year-over-year increase.

Additionally, the state has partnered with Vanderbilt University and the Vanderbilt Kennedy Center to develop a portal on the Transition Tennessee site that focuses specifically on Pre-Employment Transition Services. Launched in spring 2019, this site expands the state's capacity to provide high-quality, evidence-based pre-employment transition services that lead to successful post-secondary and employment outcomes for students with disabilities. The Transition Tennessee Pre-ETS Blueprint serves as an online hub for professional development and resources on Pre-ETS and offers guidance on the components of Pre-ETS to assist providers in delivery of these services. This new portal includes two courses on the foundations of Pre-ETS:

- The Power of Early Work Experiences
- Overview of WIOA and Pre-ETS

Each course features free video modules, downloadable resources, webcasts, and information about upcoming conferences and trainings. Additional courses will be added that focus on Interagency Collaboration, Connecting with Employers and Families, the Student-Centered Approach to Transition Instruction, and each of the five pre-employment transition services.

Between September 2018 and April 2019, Transition TN conducted a needs assessment of Pre-ETS services. Across all three assessments that the agency conducted, it was strongly agreed that youth with disabilities "Need substantial help preparing for the world of work."

Figure 23: TN VR ...need substantial help preparing for work

Across the board, both Pre-ETS providers and educators agreed that the five areas that Pre-ETS services address could greatly benefit youth with disabilities. Over half of parents also agreed that their children could benefit from these services; however according to information reported, there was an evident gap in knowledge about the Pre-ETS program.

Figure 24: TN VR Benefit of Pre-ETS Services

(B) who are minorities;

Response provided in section j.1.A. above.

(C) who have been unserved or underserved by the VR program;

Response provided in section j.1.A. above.

(D) who have been served through other components of the statewide workforce development system; and

Response provided in section j.1.A. above.

(E) who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

Response provided in section j.1.A. above.

2) Identify the need to establish, develop, or improve community rehabilitation programs within the State; and

The information below details the results of the last comprehensive statewide needs assessment (CSNA) that the TN VR program conducted in 2019. The state is in the middle of conducting a new CSNA that will be complete by September 2022. Information collected through the 2022 CSNA will be used in future updates to the statewide plan.

When services are not provided by VR staff, such as those offered in the CTCs or at TRC Smyrna, VR engages with various for- and not-for-profit partners, commonly referred to as Community Rehabilitation Providers or CRPs, to deliver individualized and specialized services to customers. These services can include supported employment, job readiness and placement, and other services that provide training in preparation for competitive, integrated employment. Community Rehabilitation Provider partnerships are typically carried out through contractual relationships or by Delegated Authority and allow the VR program the flexibility to provide a comprehensive array of highly individualized services while clearly communicating service level expectations and provider accountability. In fiscal year 2019, VR contracted with over 150 CRPs and other entities across the state to deliver specialized services to individuals participating in the VR program.

According to the 2019 VR Needs Assessment, CRPs were the most satisfied group when it came to questions related to VR service delivery. However, those surveyed identified some potential areas for improvement, including streamlining the reporting process, ensuring an equitable referral process, improving the payment process, reducing VR staff turnover, providing additional training to VR staff, and improving communication.

This last identified need –improving communication – was also identified in the 2016 needs assessment. Since that time, the division has made strides to improve upon its relationship with CRPs. In 2014, the division’s Contracts Unit began hosting provider forums where information is shared and a greater level of communication between VR and its CRPs is reached. The forums serve as the primary platform for information exchange for the VR Contracts Unit staff, VR field staff and CRPs. Forum participants share best practices/trends, ask and answer questions, raise concerns and keep each other informed of upcoming changes and other aspects of service provision. Providers have expressed their appreciation for timely sharing of information and guidance provided at the Forums regarding VR requirements. The Forums always consist of a question and answer period where providers can share with each other helpful information and clarify with the VR Program Specialists any requirements of the terms and conditions of the agreement. This collaborative relationship between VR staff and CRPs is vital to the provision of quality services for VR clients and will continue to be a priority that the division continues to cultivate moving forward.

- 3) [Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act.](#)

Response provided in section j.1.A. above.

(k) [Annual Estimates](#). Describe:

- 1) [The number of individuals in the State who are eligible for services.](#)

Cornell University produces annual disability status reports for each state that look at the social and economic status of non-institutionalized people with disabilities in the state. The following disability and employment statistics were included in their 2018 Disability Status Report, which uses data from the 2018 American Community Survey (ACS):

Prevalence of Disability in Working-Age (21-64) People (2018): Tennessee - 14.0%, Nation - 10.4%, Difference - +3.6%

Employment Rate of Working-Age (21-64) People with Disabilities (2018): Tennessee - 34.5%, Nation - 37.8%, Difference - -3.3%

Employment Rate of Working-Age (21-64) People without Disabilities (2018): Tennessee - 79.0%, Nation - 80.0%, Difference - -1.0%

Employment Rate of Working-Age (21-64) People with and without Disabilities in TN (2018):
Tennesseans with Disabilities - 34.5%, Tennesseans without Disabilities 79.0%, Difference - -44.5%

According to the most recent data obtained by the Tennessee Department of Education report card, the number of students with disabilities (defined as those who have an IEP) from the 1,806 schools offering Pre-K – 12th grade across the state of TN: Total # of Students – 957,423, # of Students with Disabilities (IEP) - 129,252, % of Students with Disabilities (IEP) - 13.5%.

2) The number of eligible individuals who will receive services under:

(A) The VR Program;

For Federal Fiscal Year 2020, the VR program processed 4,753 new applicants and 11,870 individuals in the state were eligible for services under an IPE. Of the total individuals eligible for services under an IPE, 8,325 were in priority category 1 and 3,545 were in priority category 2.

For Federal Fiscal Year 2021, the VR program processed 4,469 new applicants and 11,240 individuals in the state were eligible for services under an IPE. Of the total individuals eligible for services under an IPE, 8,164 were in priority category 1 and 3,076 were in priority category 2.

Estimates:

For Federal Fiscal Year 2022, it is projected that there will be 4,692 new applicants and 11,834 individuals in the state will be eligible for services under an IPE. Of the total individuals eligible for services under an IPE, an estimated 8,520 will be in priority category 1 and 3,314 in priority category 2.

For Federal Fiscal Year 2023, it is projected that there will be 5,161 new applicants and 13,017 individuals in the state will be eligible for services under an IPE. Of the total individuals eligible for services under an IPE, an estimated 9,372 will be in priority category 1 and 3,645 in priority category 2.

(B) The Supported Employment Program; and

For Federal Fiscal Year 2020, 2,780 individuals in the state were eligible for services under a Supported Employment IPE.

For Federal Fiscal Year 2021, 2,750 individuals in the state were eligible for services under a Supported Employment IPE.

Estimates:

For Federal Fiscal Years 2022, it is projected that 2,887 individuals in the state will be eligible for services under a Supported Employment IPE.

For Federal Fiscal Years 2022, it is projected that 3,031 individuals in the state will be eligible for services under a Supported Employment IPE.

(C) each priority category, if under an order of selection.

For Federal Fiscal Year 2020, 11,870 individuals in the state were eligible for services under an IPE. Of the total individuals eligible for services under an IPE, 8,325 were in priority category 1 and 3,545 were in priority category 2.

For Federal Fiscal Year 2021, 11,240 individuals in the state were eligible for services under an IPE. Of the total individuals eligible for services under an IPE, 8,164 were in priority category 1 and 3,076 were in priority category 2.

Estimates:

For Federal Fiscal Year 2022, it is projected that 11,834 individuals in the state will be eligible for services under an IPE. Of the total individuals eligible for services under an IPE, an estimated 8,520 will be in priority category 1 (Includes Title VI, Part B) and 3,314 in priority category 2.

For Federal Fiscal Year 2023, it is projected that 13,017 individuals in the state will be eligible for services under an IPE. Of the total individuals eligible for services under an IPE, an estimated 9,372 will be in priority category 1 (Includes Title VI, Part B) and 3,645 in priority category 2.

3) The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

As of September 30, 2020, 7 individuals were eligible for services in priority category 3 and 9 individuals were eligible for services in priority category 4 but did not receive such services due to order of selection.

As of September 30, 2021, 9 individuals were eligible for services in priority category 3 and 15 individuals were eligible for services in priority category 4 but did not receive such services due to order of selection.

The VR program conducts routine contacts to individuals in priority categories 3 and 4 to follow up and evaluate current needs and circumstances. Through this process we identify individuals who are eligible to move into categories 1 and 2 as well as individuals who could be referred to other programs and are no longer in need of VR services. The VR Program has been operating under Order of Selection since August 1, 2001, which is known throughout the advocacy community and our potential customer base. We understand that the number of individuals in priority categories 3 and 4 does not accurately reflect the number of individuals across the State who may be eligible for priority categories 3 and 4 were they to be opened. Based on this information, for FFY 2022 and 2023 it is projected that 10 individuals will be eligible for services in priority category 3 and 15 individuals will be eligible for services in priority category 4 each year but will not receive such services due to order of selection.

- 4) The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

It is estimated that the FFY 2022 cost of Title I, Part B and Title VI, Part B services for the projected 11,834 individuals who will be eligible for services under an IPE will be approximately \$30,000,000 and that the service cost for each priority category within the Order of Selection for the individuals served will be:

- Priority Category 1 - \$21,600,000 (Includes Title VI, Part B)
- Priority Category 2 - \$8,400,000

Total \$30,000,000

Note: Estimated cost for services is based on the total available funding approved by the State's Department of Finance and Administration for our Delegated Purchase Authority based on the Division's projections and at its request.

For FFY 2023, it is estimated that the cost of Title I, Part B and Title VI, Part B services for the projected 13,017 individuals who will be eligible for services under an IPE will be approximately \$30,000,000 and that the service cost for each priority category within the Order of Selection for the individuals served will be:

- Priority Category 1 - \$21,600,000 (Includes Title VI, Part B)
- Priority Category 2 - \$8,400,000

Total \$30,000,000

Note: Estimated cost for services is based on the total available funding approved by the State's Department of Finance and Administration for our Delegated Purchase Authority based on the Division's projections and at its request.

The VR Program will continue to provide a full range of assessment services for all applicants that apply throughout the year to determine eligibility and priority for services. The VR Program plans to continue the Order of Selection mandated by the Rehabilitation Act of 1973, as amended, to determine which eligible individuals will be served under an IPE due to limited resources. During FFY 2022, the VR Program will conduct an evaluation of resources, expenditures, and service needs to determine whether it may be possible to schedule releases of priority categories 3 and 4.

(I) State Goals and Priorities. The designated State unit must:

- 1) Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

Members of the SRC extensively reviewed all recommendations received through the VR Needs Assessment to determine what VR leadership and staff should prioritize for program improvement over the next three to four years. Below, there is discussion on the seven priorities identified.

Members of the SRC extensively reviewed all recommendations received through the 2019 VR Needs Assessment to determine what VR leadership and staff should prioritize for program improvement.

Below are specific priorities that were identified in 2019 and updates on progress that has happened since that time.

1. Talent Management

Over the last several years, VR senior leadership has reorganized leadership positions and created additional key positions to increase capacity, knowledge, and expertise across all program areas. Various units within the Division have grown to address the needs of those we serve, providers that we work with, and our key stakeholders.

Specifically, over the last year, VR senior leadership has taken on a tremendous project to review and reorganize VR field positions. To address high turnover and staff attrition, attract and retain top talent within VR, and improve customer experience outcomes, the division evaluated the existing staffing model and made changes to ensure that classifications align with the roles and responsibilities of a modernized, community-based vocational rehabilitation program and that compensation is commensurate with position qualifications, responsibilities, and fair market value. As a result, five new classifications were created for the division and two existing classifications experienced salary increases. The new classifications create a career pathway with opportunities for growth and advancement within the division. The outcome of the salary increases include an 8.5% increase in the average salary and an estimated \$700,000 investment in staff pay.

In addition to modernizing our approach to staffing, the division has also been focused on supporting its staff across the state by implementing various training initiatives. At the end of 2020, the division, in partnership with the TDHS People Operations team, launched the first two modules of the newly created DRS Connecting Opportunities, Resources, and Education (CORE) training. This training replaced the previous New Counselors Institute (NCI) and will be the primary onboarding training for new staff joining the division. The first two modules of CORE are offered to all new division staff, regardless of their role, and the curriculum has been designed to align with the division's mission, vision, values, and overall transformation. The training is driven by the principles that Everyone Can Work and that all interactions with customers incorporate the Person-Centered philosophy. Throughout fall 2021 and winter 2022, VR leadership are continuing to work with People Operations on the creation of the remaining CORE modules, which will be offered first to VR Counselors and will be focused on service delivery during the various phases of the customer journey within VR.

Additionally, in August 2020, the division kicked off statewide person-centered training for all Vocational Rehabilitation staff – Counselors, Business Employment Consultants, Pre-Employment Specialists, Support Staff, Supervisors, TRC-Smyrna, CTCs, TBE, Independent Living (IL), Central Office staff and Leadership. The initiative, funded by the TN Council on Development Disabilities, was conducted by consultants from Griffin-Hammis Associates, and was broken down into various activities over the last

year and a half. The first activity offered an introduction to person-centered thinking, while the second activity offered staff a deeper dive into putting theory into practice. Both activities were offered virtually, with additional online learning modules staff were asked to participate in, as well as additional readings and activities that staff were asked to complete and discuss with their supervisors and teams. Currently, Griffin-Hammis is engaged in a third, follow-up activity for specific teams across the division that aims to truly operationalize the Everyone Can Work training in various settings and work with the teams on continuous quality improvement.

2. Communication and Responsiveness

The VR Program has been and continues to be committed to increasing the way that we communicate internally, as well as externally, to ensure that we are actively sharing information and that the information we are sharing is consistent. To that end, over the last few years, we have deployed various technologies to assist in external communication efforts. One of these efforts was the implementation of a virtual chatbot in 2021 that is housed on the DHS website and is pre-programmed with answers to questions about VR services. Interactions with the chatbot are designed to mimic conversations with a person. One of the largest benefits of the chatbot is that it is available 24 hours a day, 365 days a year. We have observed that a large percentage of traffic received through the chatbots is coming after normal office hours, thus expanding our ability to provide communication during off hours.

Additionally, in January 2022, the VR program launched a cloud-based phone system, utilizing the Nice inContact phone platform, that includes Interactive Voice Response (IVR) to provide incoming callers with information about the VR program, before having to speak to a VR staff member. This IVR is set up similarly to the chatbot and mimics human conversation. Additionally, through this new phone system, customers are also able to opt into a follow-up survey that gathers their thoughts and opinions on the customer service that they received throughout the call. This feedback, as well as other analytics gathered through the new phone system, will be used to continually improve staff's customer service skills, and refine what information may be most beneficial to include in the IVR.

As a result of the 2019 CSNA, the SRC recommended the creation of a VR-specific newsletter that highlights to a greater extent the Division's accomplishment, explores services and current policies, and celebrates customer success stories as a means of marketing the program. A Pre-ETS- specific newsletter titled "Let's Talk Pre-ETS in Tennessee" has been created with the first edition being published and shared on April 1, 2021. The newsletter contains information to keep readers informed of pre-ETS happening and successes and is disseminated quarterly to internal staff, contractors, schools, and other stakeholders (anyone is eligible to sign up with an email address to receive the electronic newsletter). We are currently exploring the possibility of creating a newsletter that encompasses all VR programs to share with contractors, stakeholders, partners, and internal team members.

The State Rehabilitation Council (SRC) Outreach, Public Relations, and Awareness Committee made site visits, reviewed current marketing materials (both hard copies and online) and made recommendations for updating materials to ensure programs are adequately represented and the graphics used show a modernized VR serving a diverse group of customers. The committee is also currently reviewing the VR website to ensure plain language is used to describe the various VR programs, including Independent Living, Independent Living Older Blind, Pre-ETS, CTRC, TRC Smyrna, Business Services Unit, etc. VR leadership and staff continue to explore ways to better share success stories. As we transform our division, the ability to share updated and accurate information among our staff, partners, and the public is a high priority.

VR leadership has also been working to increase internal communication. An employee engagement survey was conducted in 2020 and to foster trust and credibility with VR employees, the full survey and results were shared with team members. Intentional discussion of the results occurred with all staff statewide. Discussions occurred in smaller groups and focused on identifying strengths, weaknesses, and opportunities to maintain and enhance employee engagement. Feedback, including recommendations, were compiled and shared with VR leadership. In relation to communication VR Employees had this to contribute:

In general, everyone felt communication had improved drastically in recent years but there was still work to do. Many remarked that the communication related to Aware implementation has been the best yet and offered plenty of time to become familiar with changes before having to change processes and activities. Many feel that at times communication comes from too many directions (policy, systems, leadership, HR, QISS) or seems to be one-off suggestions or changes without a planned approach for implementing or ensuring upstream and downstream effects are conveyed. Recommendations for improving communication include a feedback loop for staff to report how changes went, regular newsletter and including CRPs in communications which may or may not have a direct effect on them.

Lastly, VR leadership has also worked to increase the usage of the Intranet available to staff, most notably in terms of creating a repository for training information and resources for staff to use. This will continue to be used as a communication tool moving forward and has proven successful in ensuring that staff have one central place to go for the information that they are seeking.

3. Timeliness of Services

Over the last several years, the VR Program has been intentionally evaluating internal business processes and service delivery mechanisms. We've identified what works well and have also identified opportunities for change.

Over the last two years, VR staff worked diligently on the implementation of a new case management software system, called Aware, that supports VR business processes and increases efficiency for both staff and customers. Many staff from across program lines were part of the implementation team and worked together, along with the vendor, throughout all project phases including adaptation, data migration, identifying and designing needed customizations and interfaces, multiple phases of testing, training, and finally preparing for statewide rollout of the system.

On July 7, 2021, Aware, went live statewide and serves as the division's system of record, or authoritative data source. In the months following the rollout of the new system, the team has continued to work diligently to work out the "kinks" of this new system and to support field staff during this transformation by offering virtual office hours, additional training material, and identifying enhancements needed to improve workflow, service, and payment delivery.

To further support the implementation of the new case management system and to advance the person-centered philosophy embedded within VR culture, the division has revised VR policies and procedures to better align with the overall transformation of the VR program. The revised policies and procedures are organized to follow the customer journey through the VR program. In addition, the revisions have eliminated unnecessary restrictions and overly prescriptive language where possible and identified strategies for applying person-centered philosophies to policy. The SRC and other stakeholders were engaged throughout the review process providing input and feedback on policy drafts prior to the official public comment period that opened in April of 2021. Staff and providers were

trained on the new policies and business practices in the summer of 2021 prior to the implementation of the new case management system in July 2021.

As a direct result of the above actions, over the coming years, the Division will be focused on what our data tells us about the program that we run and the services that we provide. This data will enhance the capacity of staff to use and analyze data to inform and improve practices and outcomes.

4. Customer Engagement

In addition to the CSNA that is conducted jointly by the SRC and the VR program every three years, another tool used to assess customer satisfaction are ongoing surveys of VR customers at four significant stages of the VR customer journey – application, plan development, service provision, and closure. Specifically, these surveys are provided to customers through key documents that are mailed to the customer at these stages of their journey. Each survey is a quick five question survey designed to gain essential feedback without overburdening the customer. While these surveys provide a glimpse into the reported satisfaction of VR customers, there is still considerable work for the VR program to do in increasing the number of customers that complete surveys at each stage of the process. Increasing customer engagement and improving the tools available to capture the voice of the customer are strategic priorities for both the Department of Human Services and the Division of Rehabilitation Services. The department will continue to use customer insights to define and prioritize experience requirements and opportunities for improvement.

5. Transportation

Transportation is commonly cited as one of the leading barriers that impedes individuals with disabilities from obtaining employment in the community. Over the last two years, great progress has been made in the state of TN to address this barrier. Several years ago, a small group of concerned stakeholders began meeting to brainstorm ways to address this barrier. What started as a small group of invested partners grew exponentially over the years and became a transportation working group, informally convened by the Council on Development Disabilities. This working group brought together various state agencies, local government representatives, and nonprofit entities to collaborate and brainstorm on ways to address the overall transportation barrier impacting Tennesseans, regardless of disability. The efforts of this group were reported out to the Employment First Task Force.

Over the last two years, this group, was able to lobby for and create a dedicated [Tennessee Office of Transportation and Mobility](#) (OMAT), housed under the TN Department of Transportation. The transportation working group has now been retired and replaced by this formal state government office. The purpose of the office is to provide resources and expertise for expanding and improving accessible transportation and mobility across the state of TN. Since its inception, OMAT has created a five-year strategic plan and has produced the state's first annual report about accessible transportation in TN, both of which are available on the OMAT website.

OMAT is in the process of creating a Statewide Advisory Board and Regional Subcommittees to advise OMAT staff and to help implement the office's strategic priorities. The VR Program will continue to be involved with OMAT and has identified a staff representative to sit on the Advisory Board and will identify staff to participate in the Regional Subcommittees as they are implemented.

6. Knowledge of Community Resources and Partnerships

VR program leadership has been working with VR staff to help increase their knowledge of community resources, partnerships, and to identify additional opportunities to work with and educate community partners on service delivery and disability awareness.

In 2021, nine VR team members became certified trainers of the Windmills disability awareness training program. Windmills equips business leaders and others with the knowledge, skills, and tools to create a workplace inclusive of individuals with disabilities. Windmills has a proven history of assisting those with and without disabilities to better understand the culture of disability in the workplace. The 12-module curriculum relies on interactive methods to help participants recognize the benefits of diverse experiences and abilities, improve communications with and about people with disabilities, learn about accommodations, and understand the basics of disability employment law. Training is customized to meet the needs of business leaders or other entities who want to achieve these learning objectives. To date, more than 25 training sessions have been provided to businesses across the state.

One of the VR program's most notable service delivery transformations is illustrated in the Community Tennessee Rehabilitation Centers (CTRCs) transformation from a workshop model of service delivery into community-based resource centers offering community-based employment training, and connecting VR and non-VR customers to education, training, and employment resources.

R.I.S.E. – Road to Independence, Success, Employment – is what VR has branded the new community-based service delivery model for the CTRCs. With R.I.S.E. the centers have become community-based person-centered services that prepare and support individuals in going to work. The services are provided within the community with the support of local partners such as businesses, non-profits, city, county, and state agencies, as well as local education agencies.

R.I.S.E. core services are the vocational rehabilitation services that all 17 CTRCs will provide under the service delivery model. Services may look a little different from one county to the next because of unique labor markets and community characteristics, but all 17 CTRCs will provide R.I.S.E. core services.

Independence services include assisting a customer with discovery – researching social capital contacts, creating a vocational profile, conducting assistive technology assessments, researching training opportunities like apprenticeships and certification classes, and touring Tennessee Centers of Applied Technology (TCATs), colleges or training schools. Independence services also include community access and inclusion services that assist a customer with exploring transportation routes, drivers' education preparation, locations of food banks and faith-based organizations, and assisting with other TN Department of Human Services (TDHS) and state services like food assistance, mental health, or housing.

Success services include job coaching, job supporting, coordinating job retention assistance or other extended services to support a customer with employment training.

Employment services include career readiness and career assessment services like mock interviews, soft skills training, assisting with certification training, conducting job tours, job shadowing, coordinating apprenticeship or pre-apprenticeship opportunities, and work-based learning.

Over the last year, to help the VR program achieve this new community-based service delivery model and deliver R.I.S.E services, the CTRCs identified and implemented three pilot programs as alternatives

to the workshop model. The goal of the pilots was to increase referrals to the VR program, increase competitive integrated employment outcomes for VR customers, and to be replicated at other CTRCs across the state. CTRC Columbia implemented a pilot to develop a competitive integrated work-based learning summer work experience for incoming juniors or seniors with disabilities to promote employment and/or postsecondary educational attainment. CTRC Shelbyville implemented a community-based pilot with a focus on career exploration and independent living in the local Shelbyville community for youth ages 14 – 22 who are at risk to becoming employed or enrolled in an educational program. CTRC Greeneville implemented a job-driven model to strengthen collaboration, communication, and integration of employers, community partners like community colleges, and individuals with disabilities in the local Greene County workforce. The CTRCs continue to grow and expand on these pilots and are consistently identifying new community partnerships that will lead to additional community-based service delivery models.

7. Pre-Employment Transition Services (Pre-ETS)

The Vocational Rehabilitation program continues to make progress in the delivery of pre-employment transition services (Pre-ETS) to students with disabilities ages 14-22 across Tennessee, despite the impact COVID-19 had on in-person instruction. Pre-ETS include counseling in post-secondary education, career exploration, self-advocacy, workplace readiness, and work-based learning. Much like the conclusion of the 2020 school year, the 2020-2021 school year had to be approached differently to ensure Pre-ETS were still made available statewide to eligible and potentially eligible students.

In addition to the Pre-ETS services provided by Community Rehabilitation Providers (CRPs), VR works directly with local school districts through the Transition School to Work (TSW) program. The TSW program focuses on the provision of Pre-ETS to eligible and potentially eligible high school students with disabilities who are interested in employment after leaving high school. During the 2020-2021 school year, VR operated 58 Transition School to Work programs across the state. Additionally, VR was proud to bring on two new school districts who are providing Pre-ETS, bringing the total to 60 school districts. This includes being able to partner with an additional school district that is in an economically distressed county. As of the fall of 2021, there are only three school districts residing within a distressed county who do not have a TSW; however, Pre-ETS are made available through CRPs. During the 2020-2021 school year, the number of individuals receiving at least one Pre-ETS through VR's contracted CRPs and TSW programs was 36,523 with a total of 76,481 units provided.

As mentioned above, the provision of Pre-ETS during the 2020-2021 school had to look different than previous years to be able to meet the varying school models across the state (i.e., in-person, virtual, and/or hybrid). To meet the needs of the school districts and students, Tennessee VR continued to make available virtual Pre-ETS. As a result, Tennessee VR has been highlighted for the accomplishments made over the past year which saw on average 50% of services being provided virtually. This resulted in as many as 2,000 students in some months able to receive Pre-ETS virtually and saw an increase from 1,715 students in program year quarter one (PY Q1) receiving Pre-ETS, to 5,538 students in program year quarter four (PY Q4). This was accomplished by providing training, resources, and guidance throughout the year to CRPs and TSWs through online training, the creation of a quarterly Let's Talk Pre-ETS in Tennessee newsletter, and new virtual training content and webcasts made possible through VR's partnership with the Vanderbilt Kennedy Center.

In May 2021, VR entered a 5-year contract with the Vanderbilt Kennedy Center to administer Transition Tennessee, a virtual learning platform for educators, students, and families. As a result, a tremendous

amount of content and training have been produced and delivered online to Pre-ETS providers and students this year. Over 15,961 unique users have accessed the Pre-ETS portal. Further, a Pre-ETS Manual for providers was developed to provide guidance, resources, and best practices in service delivery. Additional content will continue through the upcoming contract, but the focus will shift from developing content to implementing practices that ensure quality services are provided and student outcomes are positively impacted. This will be done by developing a Pre-ETS Scope and Sequence guide, providing more training opportunities in collaboration with education partners, and establishing model demonstration sites.

As research has shown us, a strong predictor for post-school employment outcomes is providing paid work experiences for students with disabilities while still in high school (Carter, Erik, Austin, and Trainer, 2011). Therefore, Tennessee VR sought to provide a structure and process to developing high-quality work-based learning (WBL) capstone experiences for students receiving Pre-ETS. The expectation for the WBL capstone experience is for students to be immersed in a business within the community setting for at least 15 hours each month for a maximum of 90 days. Several CRPs were able to establish summer work experiences for students and that trend has continued into the start of the school year for the fall of 2021. The initial anecdotal information point to this being a very promising practice that can lead to increased employment outcomes.

Lastly, over the last two years, the division hired a newly created leadership position, VR Fiscal Director, who is responsible for understanding and tracking the unique budgetary needs and requirements of the VR program. This will allow the division to have a better overall view of the VR program's budget, including the need to meet the 15% requirement for Pre-ETS.

2) Identify the goals and priorities in carrying out the VR and Supported Employment programs.

Response provided in section I.1 above.

3) Ensure that the goals and priorities are based on an analysis of the following areas:
(A) the most recent comprehensive statewide assessment, including any updates;

Response provided in section I.1 above.

(B) the State's performance under the performance accountability measures of section 116 of WIOA; and

Two of the strategic priorities for the Division of Rehabilitation Services involve modernization of systems utilized by the division and the increased use of data to drive outcomes and ensure performance accountability. The division implemented a new VR case management system, Aware, in July 2021. The new case management system was selected because of its ability to empower staff,

customers, and providers with increased access to information and data, allowing staff to track performance goals and metrics more accurately, and to better identify trends. Additionally, over the last year, some staff were provided with a license and training on Tableau, a data analytics software that can work in conjunction with Aware to enhance the division's capacity to use and analyze real-time data to inform and improve practice and program outcomes.

(C) other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

Response provided in section I.1 above.

(m) Order of Selection Describe:

- 1) Whether the designated State unit will implement and order of selection. If so, describe:
 - (A) The order to be followed in selecting eligible individuals to be provided VR services.

The Division has established four (4) categories in determining individuals to be provided VR services. The Order of Selection categories in the order to be followed are:

PRIORITY CATEGORY I -- Eligible individuals who have the most significant disabilities

PRIORITY CATEGORY II -- Eligible individuals who have significant disabilities

PRIORITY CATEGORY III -- Eligible individuals who do not have significant disabilities and whose vocational rehabilitation is expected to require multiple vocational rehabilitation services

PRIORITY CATEGORY IV -- Eligible individuals who do not have a significant disability that cannot be classified into a higher priority category

Definitions:

The Order of Selection is based on a refinement of the three criteria in the definition of "Individual with a Significant Disability" in 34 CFR § 361.5(c)(30).

"Significant Disability" means an individual meets the following three criteria:

1. Has a severe physical, sensory, or mental impairment which seriously limits at least one functional capacity (such as cognitive, visual/mobility, communication, self-care, self-direction, interpersonal skills, motor skills, work tolerance, or work skills) in terms of an employment outcome;
2. Has one or more physical or mental disabilities resulting from amputation, arthritis, autism, blindness, burn injury, cancer, cerebral palsy, cystic fibrosis, deafness, deaf /blind, head injury, heart disease, hemiplegic, hemophilia, respiratory or pulmonary dysfunction, mental

retardation, mental illness, multiple sclerosis, muscular dystrophy, musculoskeletal disorders, neurological disorders (including stroke and epilepsy), paraplegia, quadriplegia and other spinal cord conditions, sickle cell anemia, specific learning disability, and end-stage renal disease; or another disability or combination of disabilities determined on the basis of an assessment for determining eligibility, and vocational rehabilitation needs to cause comparable substantial functional limitation; and

3. The individual's vocational rehabilitation program can be expected to require multiple vocational rehabilitation services over an extended period of time.

"Most Significant Disability" means an individual meets the definition for "Significant Disability" with the exception the individual has a severe physical, sensory or mental impairment which seriously limits two or more functional capacities in terms of an employment outcome.

"Non-Significant Disability" means an individual does not meet the criteria for "Significant Disability".

"Multiple Vocational Rehabilitation Services" means two or more major vocational rehabilitation services, such as, physical or mental restoration, training, and placement. Excluded are support services such as transportation, maintenance and the routine counseling and guidance that takes place in every case.

"Extended Period of Time" means 6 months from the date services begin until the employment objective is achieved.

(B) The justification for the order.

On August 1, 2001, the Division implemented an Order of Selection in accordance with federal regulation 34 CFR § 361.36 due to limited resources preventing the Division from providing the full range of services to all eligible individuals. Following implementation of the Order of Selection, the Division provided a full range of services for individuals in Priority Category 1 (eligible individuals who have the most significant disabilities) until October 2012 when the Division opened Priority Category 2 and began providing a full range of services for individuals in Priority Categories 1 and 2. Since 2009 the Division has had numerous releases of Priority Category 2 (until October 2012) and 3 cases as resources have become available.

The current Order of Selection is based on previous state funding and other non-federal share available to draw an average of \$51,870,264 in federal funds since 2017. As required by federal regulations, fifteen percent (15%) of the finally awarded federal funds must be set aside and spent providing Pre-Employment Transition Services (Pre-ETS) directly to students with disabilities aged 14 to 22 and in general may not be used for administrative costs required to provide those Pre-ETS services. The

Division expects to continue to obligate approximately \$30,000,000 in direct service funds and an additional \$11,676,022.09 in contracted services for both non-Pre-ETS and Pre-ETS recipients. These funds are allocated for services to an estimated 4,692 new cases and for IPE services for approximately 11,834 existing and new Priority Category 1 and 2 recipients and for the provision of individualized and discrete services to potentially eligible students with disabilities eligible through Pre-ETS.

The VR Program will continue to provide a full range of assessment services for all applicants that apply throughout the year to determine eligibility and priority for services. The VR Program plans to continue the Order of Selection mandated by the Rehabilitation Act of 1973, as amended, to determine which eligible individuals will be served under an IPE due to limited resources. During FFY 2022, the VR Program will conduct an evaluation of resources, expenditures, and service needs to determine whether it may be possible to schedule releases of priority categories 3 and 4.

(C) The service and outcome goals.

The Order of Selection priority categories outcome and service goals and time frames are as follows:

FFY 2020

PRIORITY CATEGORY I - Eligible individuals who have the most significant disabilities

1. Outcome and Service Goal: Expect to determine eligibility for 4,240 new individuals in this priority category; serve 9,750; and close 1,120 successfully employed.
2. Goal will be achieved by September 30, 2020.

Update: As of September 30, 2020, the VR Program determined eligibility for 2,728 new individuals in priority category 1, served 8,325, and closed 917 cases with successful employment.

PRIORITY CATEGORY II - Eligible individuals who have significant disabilities

1. Outcome and Service Goal: Expect to determine eligibility for 1,817 new individuals in this priority category; serve 4,178; and close 480 successfully employed.
2. Goal will be achieved by September 30, 2020.

Update: As of September 30, 2020, the VR Program determined eligibility for 1,372 new individuals in priority category 2, served 3,545 and closed 420 cases with successful employment.

FFY 2021

PRIORITY CATEGORY I - Eligible individuals who have the most significant disabilities

1. Outcome and Service Goal: Expect to determine eligibility for 4,272 new individuals in this priority category; serve 8,512; and close 979 successfully employed.
2. Goal will be achieved by September 30, 2021.

Update: As of September 30, 2021, the VR Program determined eligibility for 2,894 new individuals in priority category 1, served 8,164 and closed 964 cases with successful employment.

PRIORITY CATEGORY II - Eligible individuals who have significant disabilities

1. Outcome and Service Goal: Expect to determine eligibility for 1,831 new individuals in this priority category; serve 3,648; and close 419 successfully employed.
2. Goal will be achieved by September 30, 2021.

Update: As of September 30, 2021, the VR Program determined eligibility for 1,066 new individuals in priority category 2, served 3,076 and closed 437 cases with successful employment.

FFY 2022 Projections

PRIORITY CATEGORY I - Eligible individuals who have the most significant disabilities

1. Outcome and Service Goal: Expect to determine eligibility for 3,038 new individuals in this priority category; serve 8,520; and close 1,012 successfully employed.
2. Goal will be achieved by September 30, 2022.

PRIORITY CATEGORY II - Eligible individuals who have significant disabilities

1. Outcome and Service Goal: Expect to determine eligibility for 1,119 new individuals in this priority category; serve 3,314; and close 459 successfully employed.
2. Goal will be achieved by September 30, 2022.

FFY 2023 Projections

PRIORITY CATEGORY I - Eligible individuals who have the most significant disabilities

1. Outcome and Service Goal: Expect to determine eligibility for 3,341 new individuals in this priority category; serve 9,372; and close 1,113 successfully employed.
2. Goal will be achieved by September 30, 2023.

PRIORITY CATEGORY II - Eligible individuals who have significant disabilities

1. Outcome and Service Goal: Expect to determine eligibility for 1,231 new individuals in this priority category; serve 3,645; and close 505 successfully employed.
2. Goal will be achieved by September 30, 2023.

The VR Program will continue to provide a full range of assessment services for all applicants that apply throughout the year to determine eligibility and priority for services. The VR Program plans to continue the Order of Selection mandated by the Rehabilitation Act of 1973, as amended, to determine which eligible individuals will be served under an IPE due to limited resources. During FFY 2022, the VR Program will conduct an evaluation of resources, expenditures, and service needs to determine whether it may be possible to schedule releases of priority categories 3 and 4.

(D) The time within which these goals may be achieved for individuals in each priority category within the order; and

The Order of Selection priority categories outcome and service goals for FFY 2022 will be achieved by September 30, 2022.

The Order of Selection priority categories outcome and service goals for FFY 2023 will be achieved by September 30, 2023.

(E) How individuals with the most significant disabilities are selected for services before all other individuals with disabilities.

The VR Program is currently providing a full range of services for individuals determined to be Priority Category 1 (eligible individuals who have the most significant disabilities) and Priority Category 2. If the VR Program cannot continue to provide a full range of services for all individuals determined to be Priority Category 1 and 2, then individuals in Priority Category 1 will continue to be served and individuals in Priority Category 2 will be provided services based on the date of application for services. If the VR Program cannot continue to provide a full range of services for all Priority Category 1, then services will be provided based on the date of application for services.

The VR Program received an increase in state funding of \$3,229,700.00 in state fiscal year 2021 and an additional increase of \$198,000.00 in state fiscal year 2022. As such, the VR Program will conduct an evaluation of resources, expenditures, and service needs to determine whether it may be possible to schedule releases of priority categories 3 and 4.

2) If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.

The Division elects not to serve eligible individuals, regardless of any established order of selection who require specific services or equipment to maintain employment.

(n) Goals and Plans for Distribution of title VI Funds.

- 1) Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.

It is the continued goal of the Division to provide quality supported employment services which are delivered in an effective, efficient, and timely manner. Supported employment services are provided by preferred Community Rehabilitation Providers (CRPs) approved by the Division and in collaboration with programs developed by the Departments of Intellectual and Developmental Disabilities (DIDD) and Mental Health and Substance Abuse Services (DMHSAS) and by the Division of TennCare (TN's Medicaid program).

The Division has implemented preferred staff experience and training requirements for Community Rehabilitation Providers of supported employment services. CRP Employment Specialists training may be provided through the Association of Certified Rehabilitation Education (ACRE) or Employment Specialists certification by obtaining a Certified Employment Support Professional (CESP) certification or Certified Rehabilitation Counselor certification. Tennessee CRPs have been proactive in securing the CESP certification and there have been over 225 reported staff that have obtained the certificate since CESP certification was introduced to the state.

Following assessment by VR Counselors to determine if extended and on-going support services are needed to support an individual with the most significant disability in competitive integrated employment, individuals are referred to registered CRPs for the development and provision of supported employment services and extended and on-going supports (including natural supports).

The Division maintains an excellent supported employment program along with ongoing training and support activities to ensure the continued provision of quality supported employment services.

Examples of the Division's quality SE program include:

- Through continuing contract with the University of Tennessee, Center for Literacy, Education and Employment (CLEE), the Division funds three supported employment consultants who provide CRP staff training and technical assistance, as needed, for the provision of supported employment services. The consultants also work with the Division staff on an as needed basis to provide technical assistance for supported employment.
- The Division has Program Specialists in the three grand regions of the state who assist in the monitoring of the community rehabilitation providers to ensure appropriate services are being provided to VR customers and who provide technical assistance, as needed, to CRPs and VR staff.
- The Division has a Central Office liaison who works with TennCare, mental health, intellectual and developmental disabilities, community rehabilitation providers, field staff and other appropriate entities in developing partnerships and collaboration for supported employment services and providing training and technical assistance.

The Division expects to continue increasing competitive integrated employment opportunities for individuals with severe mental illness, including those with co-occurring disorders of alcohol and drug

abuse by expanding more effective partnerships with mental health entities through the evidenced based Individual Placement and Support (IPS) Supported Employment Services.

The Division has a Memorandum of Understanding with the Division of TennCare, Long Term Services and Supports that provides for the provision of supported employment services for individuals enrolled in the Employment and Community First (ECF) CHOICES program who have intellectual or developmental disabilities. Beginning in July 2016, Tennessee, through the ECF CHOICES program, became the first state in the country to develop and implement an integrated, home and community-based services program, aligning incentives toward promoting and supporting integrated, competitive employment and independent living as the first and preferred option for individuals with intellectual and developmental disabilities.

The Division has implemented a pilot program utilizing IPS SE services for individuals with mental illness who are receiving Temporary Assistance for Needy Families (TANF). The Division and TANF share in funding the services.

IPS has become a promising SE program for individuals with mental illness who may also have other diagnoses. The Division is exploring, in collaboration with the DMHSAS and DIDD, providing IPS SE for individuals with dual diagnoses such as intellectual or developmental disabilities and mental illness. The Division is identifying preferred CRPs who work with DIDD/ECF CHOICES providers. A pilot program with one mental health provider has been implemented to learn more about the applicability of IPS SE for individuals with dual diagnoses.

The Division will assure that funds made available for SE will only be used to provide SE services to individuals who are eligible to receive such services.

The VR Program served 2,780 individuals in FFY 2020 and 2,750 individuals in 2021 under a supported employment IPE. It is projected that the VR Program will serve an estimated 2,887 individuals in FFY 2022 and 3,031 in FFY 2023 under a supported employment IPE.

2) Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:

(A) the provision of extended services for a period not to exceed 4 years; and

As mandated, the Division has set aside applicable VR funds for extended services for youth with the most significant disabilities who require supported employment but whose extended services are not funded by other entities or sources.

The Division has established appropriate services, trained service providers, and defined the criteria for extended and on-going support services that will be provided for youth with disabilities.

Extended services may be provided for a youth with a disability for up to four (4) years or until the client turns twenty-five (25) years of age, whichever comes first. Extended services for youth may be funded by another state agency or other client resources, such as a Social Security PASS or IRWE; provided by natural supports; or funded by VR provided there are no other means of funding for providing the extended services and the youth has not declined VR providing extended services. If VR funds extended services for a youth with a disability, the case cannot be closed until the time period for providing extended services ends.

For the provision of extended services to youth with disabilities, the Division will continue to collaborate and find partnership opportunities with DIDD, DMHSAS, Department of Education, and other entities to continue outreach to transition students that may need supported employment.

(B) how the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

Under Tennessee's Employment First Taskforce established by Executive Order in 2013 a Youth Memorandum of Understanding (MOU) was signed and executed with the following Agencies that will allow the Division to leverage other public funds to increase resources for extended and on-going support services:

- Department of Education
- Division of Rehabilitation Services, Vocational Rehabilitation Services Program
- Department of Labor and Workforce Development
- Department of Intellectual and Developmental Disabilities
- Department of Mental Health and Substance Abuse Services
- Council on Developmental Disabilities (which oversees the implementation of the MOU).

(o) **State's Strategies.** Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

- 1) The methods to be used to expand and improve services to individuals with disabilities.

Overall, the entire DHS agency is in a period of transformation, moving toward a more integrated service delivery model referred to as "One DHS" that is focused on modernization efforts agency-wide that will dramatically impact that way that human services are delivered and received by Tennesseans. Agency-

wide, DHS is striving to improve customer interaction, making it less bureaucratic and more customer friendly, efficient, and effective. While these modernization efforts come with enhanced technology to help create a more efficient service delivery model overall, the driving force behind the initiatives taking place is to ensure that the customer we are serving is at the center of any and all improvements being made.

Taking a similar approach, the Division of Rehabilitation Services is also striving to enhance and better integrate the programs and services that we provide. Over the last three years, the VR program has made significant changes to the way it operates and delivers services.

VR senior leadership has reorganized leadership positions and created additional key positions to increase capacity, knowledge, and expertise across all program areas. Various units within the Division have grown to address the needs of those we serve, providers that we work with, and our key stakeholders. Since 2016, the VR Policy and Contracts Units have greatly expanded to help address training needs for field staff and providers across the state. The VR Business Services Unit (BSU), formed in 2016, is in the process of reorganizing and expanding their capacity to optimally serve rural and urban customers. The BSU partners with area Chambers of Commerce, customers, businesses, and state agencies across the state as strategic partners to increase access to needed education and employment resources by connecting individuals to available local and state agency partners that offer employment, education, and apprenticeship resources that support economic stability. Additionally, the BSU works with business and industry partners to aid in meeting their workforce needs with well-trained, job-ready talent.

The Tennessee Rehabilitation Centers have also been embarking on their own transformation journeys. On July 22, 2019, the Tennessee Rehabilitation Center - Smyrna transitioned from a program-based model to a new Career and Technical Education (CTE) design to enhance the overall service delivery process and better align the Center with the WIOA Primary Indicators of Performance in the areas of Credentialing and Skills Gains. As a result of the Center's transformation, students are no longer required to participate in a specific program with designated beginning and end dates. Students now choose an Area of Study with classes offered based on an individualized schedule. On a quarterly basis, students attend day and/or evening classes and can enroll in prerequisite, required, or elective classes based on their interests, skill development needs, and Area of Study requirements. All curriculums have also been enriched to have a greater emphasis on work-based learning and community integration through required volunteer, practicum, and internship opportunities with business and industry. Upon completion of all courses, students receive a certificate of completion and have the option to take an exam to receive a national credential in their Area of Study.

Community Tennessee Rehabilitation Centers offer person-centered comprehensive services in a supportive learning environment to individuals with disabilities to increase independence and employment in the competitive labor market. Services offered at CTRCs are individualized based upon employment outcomes that are consistent with the customer's individual strengths, resources, abilities, capabilities, and informed choice. To solidify and advance the R.I.S.E. service delivery model transformation, the VR Program reviewed all the position classifications used to staff the CTRCs. Upon

completion of the review, the VR Program eliminated three position classifications and created two new position classifications that support the new service delivery model. These new position classifications are ones that:

- deliver individualized, person-centered services based on the unique needs of the customer;
- cultivate and maintain collaborative partnerships throughout the local community;
- are multi-purpose positions that can provide any of the R.I.S.E. services based on customer need;
- and are mobile, community-based positions that can deliver services throughout the local community.

To achieve this transformation, the Division of Rehabilitation Services is embarking on a 4-year strategic plan (2020-2024) to transform the Vocational Rehabilitation Program and revolutionize the customer experience. Focusing on the customer and the customer experience, the goal of the transformation is to create an environment where individuals and business served, along with VR staff and partners feel welcome, informed, and encouraged.

By the end of this transformation, the goal of the Division is to ensure that:

- VR is responsive, welcoming, informative, and encouraging showing individuals and businesses what is possible.
- Businesses seek out VR services to transform their operations and meet their workforce needs and ultimately improve their bottom line.
- CTRCs are transformed into community-based resource centers offering community-based employment training and connecting VR and non-VR customers to education, training, and employment resources.
- Pre-ETS are coordinated, collaborative, connected services that prepare students with disabilities for a seamless transition to life after high school.

The Division has identified 5 strategic priorities as outlined below.

Strategic Priorities:

Communication - Foster trust and credibility with internal and external stakeholders through reliable, accurate, transparent, and timely two-way communication.

- Create and tell a clear story of the Division's work, priorities, and successes
- Encourage safe and respectful workplace communication with mechanisms for staff to know priorities and express concerns
- Enhance transparency and responsiveness by encouraging open dialogue with stakeholders

- Guarantee staff at all levels embrace stakeholder input and feel responsibility and ownership for partnerships and collaboration

Leadership and Talent Management - Support a professional workforce that is organized and structured to deliver high quality vocational rehabilitation services through effective teams.

- Advance a culture of high performance through professional development and accountability
- Recruit, develop, retain, and recognize quality employees and equip them to deliver high quality service through continuous coaching and training
- Sustain efforts through staff retention and thoughtful succession planning

Modernization of Systems and Processes - Implement integrated systems and business processes that promote operational efficiency and programmatic effectiveness focused on the customer experience.

- Draft Division business model that supports the department's mission, vision, and core values
- Implement a case management system that empowers staff, customers, and providers with access to information
- Confirm Division policies reflect a strengths-based and person-centered philosophy

Revolutionize Service Delivery - Build innovative and effective service delivery models to better support businesses and individuals with disabilities in driving the achievement of their employment goals.

- Identify and implement evidenced-based models that lead to increased employment outcomes for individuals with disabilities
- Support Tennessee businesses in meeting their workforce needs with job ready workers
- Prepare students with disabilities for successful transition from high school to adulthood
- Foster understanding with our partners about common goals, shared responsibilities, and desired outcomes

Data Driven Services and Outcomes - Achieve improved employment outcomes for people with disabilities through data driven rehabilitation services and employment initiatives.

- Enhance capacity of staff to use and analyze data to inform and improve practice and outcomes
- Advance the integration of data systems with other resources as appropriate to facilitate innovative service delivery and collaboration
- Share program data and outcomes with stakeholders to create an environment that promotes continuous quality improvement

Specific Actions that VR will be taking over the next four years:

- Continued implementation of the new case management system, Aware (target implementation date June/July 2021).
- Review of revision of VR policies and procedures to ensure alignment with the Division's mission, vision, and values – included a renewed emphasis on person-centered practices.
- Statewide implementation of person-centered training for all staff.

- Design and development of the plan to transform the 17 Community Tennessee Rehabilitation Centers based on the findings and recommendations of Synergy Consulting partners.
- Assess and evaluate the Division's approach to professional development including an update and re-design of new counselor training, general staff on-boarding and other professional development opportunities for staff on an ongoing basis.
- Assess and evaluate the Division's staffing to include a review of position classification and compensation for alignment with the roles and responsibilities of a modernized, community-based vocational rehabilitation program.
- Improve and expand the opportunities for customer engagement throughout the vocational rehabilitation process, gathering feedback and input from VR customers at various points throughout their employment journey.

2) [How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis](#)

Providing assistive technology resources to customers throughout their time working with VR is an important part of their journey to successful employment. The division takes that responsibility very seriously and uses multiple methods to assure that customers have the knowledge, skills, and access to the tools that they need. Many of those services including assessments, training, device fabrication, job-site evaluations along with those support services required for successful use of assistive technology is provided through comprehensive contracts with uniquely qualified providers who have the staff required to provide those services. These providers provide both on-site and facility-based services that are individualized and comprehensive including the generation of a detailed report and set of recommendations that are directed by the customer and provide the customer and counselor a road map for what technology might be needed at each stage of their journey.

While customer needs may be evolving, examples of key times that customers and counselors are encouraged to consider incorporating the topic of AT into the discussion include: at the beginning of the case, prior to any transitions, when determining general access needs (such as computer access) before specific jobs are determined, when preparing for educational opportunities, prior to obtaining employment, when considering job site assessments, and in supported employment settings. Training will emphasize the diverse needs of customers and the potential need to reevaluate AT at different times during the journey to employment.

To increase the knowledge and familiarity of ever-changing technology the division includes contracted AT providers in regional meetings to share information on requested topics related to AT and implementation strategies. Ongoing training enhances AT awareness for both experienced and new staff. VR regional directors also meet quarterly with AT provider leadership to ensure open dialogue about referrals, customer concerns, AT questions and staff needs.

The state AT Act Program, the Tennessee Technology Access Program (TTAP), is not just a close partner, but share the same lead agency in the state. As a result, the two programs work in collaboration to

serve the whole AT needs of clients beyond those just related to employment. One example of this close partnership is the utilization of TTAP's device loan program. In partnership with TTAP and the AT providers shared by each program, VR customers may borrow devices to decide if a device is appropriate, for training, while waiting on equipment approval or for personal use.

- 3) The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.

According to the comprehensive needs assessment that the division conducted in 2019, immigrants, American Indian or Native American, Asian or Pacific Islander, and the Offender reentry populations were identified by survey respondents as those most "unserved" in Tennessee. Additionally, survey respondents identified rural residents, limited English proficiency, Hispanic or Latino, Offender Reentry, and Individuals with substance abuse as those most "underserved" in Tennessee. Since the 2019 assessment, VR has been actively identifying opportunities across the state to work with WIOA partners on assisting offender reentry populations. This work continues as new partnerships and opportunities are identified.

In addition to reaching out to unserved or underserved populations, the division consistently works on improving its overall outreach and communication to all Tennesseans who would benefit from the VR program. Since 2016, the DHS Director of Communication and Press Secretary both have become active members of the Employment First Communicators Work Group. The work group brings together those who serve in communications roles of Employment First Task Force member organizations to brainstorm, collaborate and strengthen communication strategies for disability employment initiatives. The group routinely promotes success stories, collaborative services, social media campaigns (#hiremystrengths), and efforts to gather stakeholder insights and education. Through this work, VR has had a greater presence on social media and is improving its outreach across the state.

Lastly, to engage those individuals with the most significant disabilities, the division has expanded its partnership with Disability Pathfinder, an organization housed at Vanderbilt University's Kennedy Center, providing free information, resources, support, and referrals to Tennesseans with disabilities and their families.

- 4) The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).

Response provided in section o.1 above.

- 5) If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.

Response provided in section o.1 above.

- 6) Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

As part of the new VR case management system that went live in July 2021, the division worked closely with one of our WIOA core partners, Department of Labor and Workforce Development (DLWD), to establish a direct interface between VR and DLWD to share post-exit quarterly wage data. The interface was designed to simplify the data exchange and provide the most updated customer information to ensure performance accountability. Additional methods to share relevant program data are continually explored with the Department of Labor as the two workforce partners collaborate to identify streamlined methods of data sharing and ways to increase inter-agency cooperation.

Additionally, the division signed on to the State Wage Interchange System data sharing agreement, allowing the division to collect interstate quarterly wage information, thus providing the division with additional information to assess performance accountability.

Lastly, the VR program conducts quarterly assessments of the WIOA performance measures. During PY 2019 and PY 2020, the VR program focused efforts on the measurable skill gain rate. To improve performance on this measure, the division implemented staff training on documentation and validation of MSGs and developed reports to assist with review of MSG reporting. These efforts resulted in improved accuracy of reporting and a significant increase in the MSG rate during PY 2019 and PY 2020. The division completed the MSG rate negotiation process with RSA for PY 2020 and 2021 and will continue working to improve performance on the MSG rate as well as the other WIOA performance measures.

- 7) Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.

Response provided in section o.1 above.

- 8) How the agency's strategies will be used to:
- (A) achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

Members of the Tennessee State Rehabilitation Council extensively reviewed all recommendations received through the 2019 VR Comprehensive Needs Assessment to determine what VR leadership and staff should prioritize for program improvement.

Below are specific priorities that were identified in 2019 and updates on progress that has happened since that time.

1. Talent Management

Over the last several years, VR senior leadership has reorganized leadership positions and created additional key positions to increase capacity, knowledge, and expertise across all program areas. Various units within the Division have grown to address the needs of those we serve, providers that we work with, and our key stakeholders.

Specifically, over the last year, VR senior leadership has taken on a tremendous project to review and reorganize VR field positions. To address high turnover and staff attrition, attract and retain top talent within VR, and improve customer experience outcomes, the division evaluated the existing staffing model and made changes to ensure that classifications align with the roles and responsibilities of a modernized, community-based vocational rehabilitation program and that compensation is commensurate with position qualifications, responsibilities, and fair market value. As a result, five new classifications were created for the division and two existing classifications experienced salary increases. The new classifications create a career pathway with opportunities for growth and advancement within the division. The outcome of the salary increases include an 8.5% increase in the average salary and an estimated \$700,000 investment in staff pay.

In addition to modernizing our approach to staffing, the division has also been focused on supporting its staff across the state by implementing various training initiatives. At the end of 2020, the division, in partnership with the TDHS People Operations team, launched the first two modules of the newly created DRS Connecting Opportunities, Resources, and Education (CORE) training. This training replaced the previous New Counselors Institute (NCI) and will be the primary onboarding training for new staff joining the division. The first two modules of CORE are offered to all new division staff, regardless of their role, and the curriculum has been designed to align with the division's mission, vision, values, and overall transformation. The training is driven by the principles that Everyone Can Work and that all interactions with customers incorporate the Person-Centered philosophy. Throughout fall 2021 and winter 2022, VR leadership are continuing to work with People Operations on the creation of the remaining CORE modules, which will be offered first to VR Counselors and will be focused on service delivery during the various phases of the customer journey within VR.

Additionally, in August 2020, the division kicked off statewide person-centered training for all Vocational Rehabilitation staff – Counselors, Business Employment Consultants, Pre-Employment Specialists, Support Staff, Supervisors, TRC-Smyrna, CTRCs, TBE, Independent Living (IL), Central Office staff and Leadership. The initiative, funded by the TN Council on Development Disabilities, was conducted by consultants from Griffin-Hammis Associates, and was broken down into various activities over the last

year and a half. The first activity offered an introduction to person-centered thinking, while the second activity offered staff a deeper dive into putting theory into practice. Both activities were offered virtually, with additional online learning modules staff were asked to participate in, as well as additional readings and activities that staff were asked to complete and discuss with their supervisors and teams. Currently, Griffin-Hammis is engaged in a third, follow-up activity for specific teams across the division that aims to truly operationalize the Everyone Can Work training in various settings and work with the teams on continuous quality improvement.

2. Communication and Responsiveness

The VR Program has been and continues to be committed to increasing the way that we communicate internally, as well as externally, to ensure that we are actively sharing information and that the information we are sharing is consistent. To that end, over the last few years, we have deployed various technologies to assist in external communication efforts. One of these efforts was the implementation of a virtual chatbot in 2021 that is housed on the DHS website and is pre-programmed with answers to questions about VR services. Interactions with the chatbot are designed to mimic conversations with a person. One of the largest benefits of the chatbot is that it is available 24 hours a day, 365 days a year. We have observed that a large percentage of traffic received through the chatbots is coming after normal office hours, thus expanding our ability to provide communication during off hours.

Additionally, in January 2022, the VR program launched a cloud-based phone system, utilizing the Nice inContact phone platform, that includes Interactive Voice Response (IVR) to provide incoming callers with information about the VR program, before having to speak to a VR staff member. This IVR is set up similarly to the chatbot and mimics human conversation. Additionally, through this new phone system, customers are also able to opt into a follow-up survey that gathers their thoughts and opinions on the customer service that they received throughout the call. This feedback, as well as other analytics gathered through the new phone system, will be used to continually improve staff's customer service skills, and refine what information may be most beneficial to include in the IVR.

As a result of the 2019 CSNA, the SRC recommended the creation of a VR-specific newsletter that highlights to a greater extent the Division's accomplishment, explores services and current policies, and celebrates customer success stories as a means of marketing the program. A Pre-ETS- specific newsletter titled "Let's Talk Pre-ETS in Tennessee" has been created with the first edition being published and shared on April 1, 2021. The newsletter contains information to keep readers informed of pre-ETS happening and successes and is disseminated quarterly to internal staff, contractors, schools, and other stakeholders (anyone is eligible to sign up with an email address to receive the electronic newsletter). We are currently exploring the possibility of creating a newsletter that encompasses all VR programs to share with contractors, stakeholders, partners, and internal team members.

The State Rehabilitation Council (SRC) Outreach, Public Relations, and Awareness Committee made site visits, reviewed current marketing materials (both hard copies and online) and made recommendations for updating materials to ensure programs are adequately represented and the graphics used show a modernized VR serving a diverse group of customers. The committee is also currently reviewing the VR website to ensure plain language is used to describe the various VR programs, including Independent Living, Independent Living Older Blind, Pre-ETS, CTRC, TRC Smyrna, Business Services Unit, etc. VR leadership and staff continue to explore ways to better share success stories. As we transform our division, the ability to share updated and accurate information among our staff, partners, and the public is a high priority.

VR leadership has also been working to increase internal communication. An employee engagement survey was conducted in 2020 and to foster trust and credibility with VR employees, the full survey and results were shared with team members. Intentional discussion of the results occurred with all staff statewide. Discussions occurred in smaller groups and focused on identifying strengths, weaknesses, and opportunities to maintain and enhance employee engagement. Feedback, including recommendations, were compiled and shared with VR leadership. In relation to communication VR Employees had this to contribute:

In general, everyone felt communication had improved drastically in recent years but there was still work to do. Many remarked that the communication related to Aware implementation has been the best yet and offered plenty of time to become familiar with changes before having to change processes and activities. Many feel that at times communication comes from too many directions (policy, systems, leadership, HR, QISS) or seems to be one-off suggestions or changes without a planned approach for implementing or ensuring upstream and downstream effects are conveyed. Recommendations for improving communication include a feedback loop for staff to report how changes went, regular newsletter and including CRPs in communications which may or may not have a direct effect on them.

Lastly, VR leadership has also worked to increase the usage of the Intranet available to staff, most notably in terms of creating a repository for training information and resources for staff to use. This will continue to be used as a communication tool moving forward and has proven successful in ensuring that staff have one central place to go for the information that they are seeking.

3. Timeliness of Services

Over the last several years, the VR Program has been intentionally evaluating internal business processes and service delivery mechanisms. We've identified what works well and have also identified opportunities for change.

Over the last two years, VR staff worked diligently on the implementation of a new case management software system, called Aware, that supports VR business processes and increases efficiency for both staff and customers. Many staff from across program lines were part of the implementation team and worked together, along with the vendor, throughout all project phases including adaptation, data migration, identifying and designing needed customizations and interfaces, multiple phases of testing, training, and finally preparing for statewide rollout of the system.

On July 7, 2021, Aware, went live statewide and serves as the division's system of record, or authoritative data source. In the months following the rollout of the new system, the team has continued to work diligently to work out the "kinks" of this new system and to support field staff during this transformation by offering virtual office hours, additional training material, and identifying enhancements needed to improve workflow, service, and payment delivery.

To further support the implementation of the new case management system and to advance the person-centered philosophy embedded within VR culture, the division has revised VR policies and procedures to better align with the overall transformation of the VR program. The revised policies and procedures are organized to follow the customer journey through the VR program. In addition, the revisions have eliminated unnecessary restrictions and overly prescriptive language where possible and identified strategies for applying person-centered philosophies to policy. The SRC and other stakeholders were engaged throughout the review process providing input and feedback on policy drafts prior to the official public comment period that opened in April of 2021. Staff and providers were

trained on the new policies and business practices in the summer of 2021 prior to the implementation of the new case management system in July 2021.

As a direct result of the above actions, over the coming years, the Division will be focused on what our data tells us about the program that we run and the services that we provide. This data will enhance the capacity of staff to use and analyze data to inform and improve practices and outcomes.

4. Customer Engagement

In addition to the CSNA that is conducted jointly by the SRC and the VR program every three years, another tool used to assess customer satisfaction are ongoing surveys of VR customers at four significant stages of the VR customer journey – application, plan development, service provision, and closure. Specifically, these surveys are provided to customers through key documents that are mailed to the customer at these stages of their journey. Each survey is a quick five question survey designed to gain essential feedback without overburdening the customer. While these surveys provide a glimpse into the reported satisfaction of VR customers, there is still considerable work for the VR program to do in increasing the number of customers that complete surveys at each stage of the process. Increasing customer engagement and improving the tools available to capture the voice of the customer are strategic priorities for both the Department of Human Services and the Division of Rehabilitation Services. The department will continue to use customer insights to define and prioritize experience requirements and opportunities for improvement.

5. Transportation

Transportation is commonly cited as one of the leading barriers that impedes individuals with disabilities from obtaining employment in the community. Over the last two years, great progress has been made in the state of TN to address this barrier. Several years ago, a small group of concerned stakeholders began meeting to brainstorm ways to address this barrier. What started as a small group of invested partners grew exponentially over the years and became a transportation working group, informally convened by the Council on Development Disabilities. This working group brought together various state agencies, local government representatives, and nonprofit entities to collaborate and brainstorm on ways to address the overall transportation barrier impacting Tennesseans, regardless of disability. The efforts of this group were reported out to the Employment First Task Force.

Over the last two years, this group, was able to lobby for and create a dedicated [Tennessee Office of Transportation and Mobility](#) (OMAT), housed under the TN Department of Transportation. The transportation working group has now been retired and replaced by this formal state government office. The purpose of the office is to provide resources and expertise for expanding and improving accessible transportation and mobility across the state of TN. Since its inception, OMAT has created a five-year strategic plan and has produced the state's first annual report about accessible transportation in TN, both of which are available on the OMAT website.

OMAT is in the process of creating a Statewide Advisory Board and Regional Subcommittees to advise OMAT staff and to help implement the office's strategic priorities. The VR Program will continue to be involved with OMAT and has identified a staff representative to sit on the Advisory Board and will identify staff to participate in the Regional Subcommittees as they are implemented.

6. Knowledge of Community Resources and Partnerships

VR program leadership has been working with VR staff to help increase their knowledge of community resources, partnerships, and to identify additional opportunities to work with and educate community partners on service delivery and disability awareness.

In 2021, nine VR team members became certified trainers of the Windmills disability awareness training program. Windmills equips business leaders and others with the knowledge, skills, and tools to create a workplace inclusive of individuals with disabilities. Windmills has a proven history of assisting those with and without disabilities to better understand the culture of disability in the workplace. The 12-module curriculum relies on interactive methods to help participants recognize the benefits of diverse experiences and abilities, improve communications with and about people with disabilities, learn about accommodations, and understand the basics of disability employment law. Training is customized to meet the needs of business leaders or other entities who want to achieve these learning objectives. To date, more than 25 training sessions have been provided to businesses across the state.

One of the VR program's most notable service delivery transformations is illustrated in the Community Tennessee Rehabilitation Centers (CTRCs) transformation from a workshop model of service delivery into community-based resource centers offering community-based employment training, and connecting VR and non-VR customers to education, training, and employment resources.

R.I.S.E. – Road to Independence, Success, Employment – is what VR has branded the new community-based service delivery model for the CTRCs. With R.I.S.E. the centers have become community-based person-centered services that prepare and support individuals in going to work. The services are provided within the community with the support of local partners such as businesses, non-profits, city, county, and state agencies, as well as local education agencies.

R.I.S.E. core services are the vocational rehabilitation services that all 17 CTRCs will provide under the service delivery model. Services may look a little different from one county to the next because of unique labor markets and community characteristics, but all 17 CTRCs will provide R.I.S.E. core services.

Independence services include assisting a customer with discovery – researching social capital contacts, creating a vocational profile, conducting assistive technology assessments, researching training opportunities like apprenticeships and certification classes, and touring Tennessee Centers of Applied Technology (TCATs), colleges or training schools. Independence services also include community access and inclusion services that assist a customer with exploring transportation routes, drivers' education preparation, locations of food banks and faith-based organizations, and assisting with other TN Department of Human Services (TDHS) and state services like food assistance, mental health, or housing.

Success services include job coaching, job supporting, coordinating job retention assistance or other extended services to support a customer with employment training.

Employment services include career readiness and career assessment services like mock interviews, soft skills training, assisting with certification training, conducting job tours, job shadowing, coordinating apprenticeship or pre-apprenticeship opportunities, and work-based learning.

Over the last year, to help the VR program achieve this new community-based service delivery model and deliver R.I.S.E. services, the CTRCs identified and implemented three pilot programs as alternatives to the workshop model. The goal of the pilots was to increase referrals to the VR program, increase competitive integrated employment outcomes for VR customers, and to be replicated at other CTRCs across the state. CTRC Columbia implemented a pilot to develop a competitive integrated work-based

learning summer work experience for incoming juniors or seniors with disabilities to promote employment and/or postsecondary educational attainment. CTRC Shelbyville implemented a community-based pilot with a focus on career exploration and independent living in the local Shelbyville community for youth ages 14 – 22 who are at risk to becoming employed or enrolled in an educational program. CTRC Greeneville implemented a job-driven model to strengthen collaboration, communication, and integration of employers, community partners like community colleges, and individuals with disabilities in the local Greene County workforce. The CTRCs continue to grow and expand on these pilots and are consistently identifying new community partnerships that will lead to additional community-based service delivery models.

7. Pre-Employment Transition Services (Pre-ETS)

The Vocational Rehabilitation program continues to make progress in the delivery of pre-employment transition services (Pre-ETS) to students with disabilities ages 14-22 across Tennessee, despite the impact COVID-19 had on in-person instruction. Pre-ETS include counseling in post-secondary education, career exploration, self-advocacy, workplace readiness, and work-based learning. Much like the conclusion of the 2020 school year, the 2020-2021 school year had to be approached differently to ensure Pre-ETS were still made available statewide to eligible and potentially eligible students.

In addition to the Pre-ETS services provided by Community Rehabilitation Providers (CRPs), VR works directly with local school districts through the Transition School to Work (TSW) program. The TSW program focuses on the provision of Pre-ETS to eligible and potentially eligible high school students with disabilities who are interested in employment after leaving high school. During the 2020-2021 school year, VR operated 58 Transition School to Work programs across the state. Additionally, VR was proud to bring on two new school districts who are providing Pre-ETS, bringing the total to 60 school districts. This includes being able to partner with an additional school district that is in an economically distressed county. As of the fall of 2021, there are only three school districts residing within a distressed county who do not have a TSW; however, Pre-ETS are made available through CRPs. During the 2020-2021 school year, the number of individuals receiving at least one Pre-ETS through VR's contracted CRPs and TSW programs was 36,523 with a total of 76,481 units provided.

As mentioned above, the provision of Pre-ETS during the 2020-2021 school had to look different than previous years to be able to meet the varying school models across the state (i.e., in-person, virtual, and/or hybrid). To meet the needs of the school districts and students, Tennessee VR continued to make available virtual Pre-ETS. As a result, Tennessee VR has been highlighted for the accomplishments made over the past year which saw on average 50% of services being provided virtually. This resulted in as many as 2,000 students in some months able to receive Pre-ETS virtually and saw an increase from 1,715 students in program year quarter one (PY Q1) receiving Pre-ETS, to 5,538 students in program year quarter four (PY Q4). This was accomplished by providing training, resources, and guidance throughout the year to CRPs and TSWs through online training, the creation of a quarterly Let's Talk Pre-ETS in Tennessee newsletter, and new virtual training content and webcasts made possible through VR's partnership with the Vanderbilt Kennedy Center.

In May 2021, VR entered a 5-year contract with the Vanderbilt Kennedy Center to administer Transition Tennessee, a virtual learning platform for educators, students, and families. As a result, a tremendous amount of content and training have been produced and delivered online to Pre-ETS providers and students this year. Over 15,961 unique users have accessed the Pre-ETS portal. Further, a Pre-ETS Manual for providers was developed to provide guidance, resources, and best practices in service delivery. Additional content will continue through the upcoming contract, but the focus will shift from developing content to implementing practices that ensure quality services are provided and student

outcomes are positively impacted. This will be done by developing a Pre-ETS Scope and Sequence guide, providing more training opportunities in collaboration with education partners, and establishing model demonstration sites.

As research has shown us, a strong predictor for post-school employment outcomes is providing paid work experiences for students with disabilities while still in high school (Carter, Erik, Austin, and Trainer, 2011). Therefore, Tennessee VR sought to provide a structure and process to developing high-quality work-based learning (WBL) capstone experiences for students receiving Pre-ETS. The expectation for the WBL capstone experience is for students to be immersed in a business within the community setting for at least 15 hours each month for a maximum of 90 days. Several CRPs were able to establish summer work experiences for students and that trend has continued into the start of the school year for the fall of 2021. The initial anecdotal information point to this being a very promising practice that can lead to increased employment outcomes.

Lastly, over the last two years, the division hired a newly created leadership position, VR Fiscal Director, who is responsible for understanding and tracking the unique budgetary needs and requirements of the VR program. This will allow the division to have a better overall view of the VR program's budget, including the need to meet the 15% requirement for Pre-ETS.

(B) support innovation and expansion activities; and

Response provided in section o.1 above.

(C) overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

Response provided in section o.1 above.

(p) Evaluation and Reports of Progress: VR and Supported Employment Goals. Describe:

- 1) An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:
 - (A) Identify the strategies that contributed to the achievement of the goals.

The goals and priorities for the VR program described in the approved VR services portion of the Combined State Plan for the most recently completed program year were:

Goal 1. Continue Increasing Successful Employment Outcomes

Objective 1.1:

A. Increase Successful Employment Outcomes by 2% or more annually over the next 4 years. The opportunity exists to reinvigorate historical referral sources. This effort will include development of

marketing initiatives for use in local areas for community outreach as well as joint efforts for partners listed below but not limited to:

- All agencies as required in the Combined State Plan
- Tennessee's Department of Labor and Workforce Development
- Department of Economic and Community Development
- Department of Intellectual and Developmental Disabilities
- Department of Children's Services and Department of Mental Health and Substance Abuse Services
- Chambers of Commerce
- Tennessee Works Partnership
- TennCare

The Division will develop strategies for increasing referrals of Pre-Employment Transition Services (PRE-ETS) through local education agencies. Special focus will include the identification of any underserved population at the regional level.

Progress: The Vocational Rehabilitation program continues to strive to increase successful employment outcomes. Despite continuing efforts to market and outreach through the identified partners, the COVID-19 pandemic significantly impacted the number of VR applicants, individuals served, and successful closures in both FFY 2020 and 2021. While FFY 2020 saw a 15% decrease in the number of successful closures, there was a 5% increase in FFY 2021 and that number is expected to continue to increase in FFY 2022 and 2023.

B. Action Steps to establish a stronger focus on employment related activities include:

Fully staff the Agency: Increase visibility and engagement of the Agency's Business Services Unit for regional and statewide activities;

- Building a comprehensive network of employment resources across the state;
- Implementing services to employers promoting the value of the Division and the hiring of people with disabilities;
- Maintain the current Community Rehabilitation Provider monitoring process to ensure effectiveness and efficiency;
- Continue to work collaboratively with and provide greater technical assistance to the Workforce Investment System. The program will continue to have counselors co-located in each of the State's Local Workforce Investment Areas' comprehensive career centers and to provide itinerant counselors to serve all satellite career centers.

The Business Service Unit's leadership and structure aligns with the Workforce Innovation and Opportunity Act. The unit models the dual customer approach, recognizing that VR must serve customers and engage businesses. There is an increased and intentional focus that extends beyond finding job vacancies and sharing them with clients to learning and understanding employer needs and ensuring VR training and customers can meet those needs. The unit's goal is for business to see VR as a

source for diversifying their workforce and providing qualified candidates for their vacant positions. Examples of this work can be found in Section G.

To continue to work collaboratively with and provide greater technical assistance to the Workforce Investment System, Vocational Rehabilitation Counselors are assigned to AJCs 2 to 3 days a week and other counselors rotate and use the space provided by the AJCs regularly. Co-location of the VR office within AJS has begun to occur in the state.

Objective 1.2:

The Program will continue to monitor expenditures and available resources to determine sufficiency of releasing and/or opening Categories 3 and 4.

Progress: The Division continues to monitor expenditures and available funding to determine if there is sufficient funding to release Category 3 and 4.

Goal 2. Improve Efficiency and Effectiveness in Client Services Delivery System

- Throughout the SFY, Vocational Rehabilitation will achieve a monthly timeliness rating of 92% for the determination of eligibility with the inclusion of extension agreements per policy. Determination of eligibility within 60 days.
- Throughout the SFY, Vocational Rehabilitation will develop the Individualized Plan for Employment within 90 days unless there is an agreed upon extension between the client and counselor. A timeliness rating of 90%.
- Meet with core partners to develop goals around the new federal standards and indicators regarding wages.

Progress: The VR Program continues to monitor timeliness of eligibility determinations and development of the Individualized Plan for Employment (IPE). Monthly rates have consistently exceeded the established performance metrics of 92% and 90% respectively. The VR Program continues to review timeliness goals to ensure individuals are receiving needed services timely.

Objective 2.2:

Research prevailing wages for various industries

Progress: In 2018, the department established the baseline hourly wage for VR customers at an average of \$10.29 per hour at the time of closure. Based on this baseline, a performance goal for all staff was established to have 50% of their cases earning more than \$10 per hour.

Objective 2.3:

- Research, develop, and implement strategies to increase the awareness and accessibility of client satisfaction surveys
- Achieving an 80 % or higher satisfaction rating for the vocational rehabilitation program as reported by the consumer satisfaction survey program for successful outcome closures
- Continue to increase staff knowledge in rehabilitation practices through on-going training.

Progress: In addition to the CSNA that is conducted jointly by the SRC and the VR program every three years, another tool used to assess customer satisfaction are ongoing surveys of VR customers at four significant stages of the VR customer journey – application, plan development, service provision, and closure. Specifically, these surveys are provided to customers through key documents that are mailed to the customer at these stages of their journey. Each survey is a quick five question survey designed to gain essential feedback without overburdening the customer. While these surveys provide a glimpse into the reported satisfaction of VR customers, there is still considerable work for the VR program to do in increasing the number of customers that complete surveys at each stage of the process. Increasing customer engagement and improving the tools available to capture the voice of the customer are strategic priorities for both the Department of Human Services and the Division of Rehabilitation Services. The department will continue to use customer insights to define and prioritize experience requirements and opportunities for improvement.

Over the last couple of years, VR program staff have been given a variety of new training initiatives discussed throughout this plan, including the introduction of new onboarding training called DRS CORE, an intensive, year-long training initiative focused on person-centered approaches and practices, and training on the new case management system. Additionally, the VR Policy team consistently identifies and provides training on business process/policy related topics. Over the last couple of years, VR leadership has been focused on creating an online repository of training materials for staff that is available to them via the State Of TN Intranet.

Objective 2.4:

Ensure access to VR documents, materials and training for clients, citizens, and staff:

- The Program will ensure that all documents and materials are available in alternate formats.
- The Program will ensure that timely requests are made when qualified interpreters are needed or requested
- The Program will create VR marketing materials to accommodate individuals with sensory disabilities
- The Program will research, develop, and implement a marketing plan to educate the community about VR services.
- Meet with Disability Pathfinder to identify needs and engage diverse populations

Progress: The Division ensures that all documents and materials are available in alternate formats as needed and requested, makes timely requests for interpreters as needed or requested, creates

marketing materials to accommodate individuals with sensory disabilities, and is working with state and community partners to educate the community about VR services. Through our partnership with TTAP, the VR program works to ensure that all state and vendor materials are accessible. Additionally, the VR program has established a separate delegated authority for providing accommodations to those applicants who have not yet been determined eligible to make providing interpreters much more efficient.

(B) Describe the factors that impeded the achievement of the goals and priorities.

Overall, the Division has experienced considerable success in achieving the VR and Supported Employment goals outlined above. However, despite this success, some goals and priorities were not fully achieved. The primary factors contributing to these challenges included COVID-19, staffing and legacy data systems.

COVID-19

Beginning in March of 2020, VR staff quickly transitioned from office-based and community work sites to work from home. Nearly 100% of VR staff began working remotely and the Tennessee Rehabilitation Center at Smyrna and the seventeen (17) community Tennessee Rehabilitation Centers suspended on-site training programs. To continue seamless provision of services to VR customers, the VR program completed this transition quickly and implemented increased flexibility regarding service delivery to allow for telephonic, online, web-based, and other alternative service delivery methods and increased flexibility regarding customer signatures. With the exception of residential and large (>10) on-site training classes, VR continued to provide all VR services and supports to its customers by appointment.

Individuals with disabilities are one of the populations at increased risk for contracting COVID-19, therefore many individuals elected to suspend VR services during the pandemic. Demand for VR services decreased and many individuals who were successfully employed previously may have lost their employment due to COVID-19. As small, local businesses and non-profit organizations, many of VR's contracted Community Rehabilitation Providers were also impacted by COVID-19. We have seen an increase in demand for services, employment opportunities, and CRP availability beginning in 2021 and expect those increases to continue to pre-pandemic levels during the next two federal fiscal years.

The VR program also worked diligently to develop and deliver guidance to our local education agency and community rehabilitation provider partners on how to continue to provide high-quality Pre-ETS through the unique circumstances we encountered. This effort resulted in the development of a nationally recognized Best Practice Guide developed in partnership with experts from the Vanderbilt Kennedy Center and Transition TN. This guide provided general strategies, techniques, tips, and resources for providing Pre-ETS in a virtual setting.

Due to the work of the Pre-ETS team to promote and provide resources for the continuation of Pre-ETS services in a virtual setting, the number of Pre-ETS providers approved to provide services virtually grew from less than 30 in July to 80 by January 2021. The Pre-ETS team continues to promote the use of virtual Pre-ETS delivery and features new resources through Transition TN.

Staffing - As noted in section (i), the number of higher education programs in the State that are preparing VR professionals has decreased to one (1). This program currently has 16 students enrolled. At this enrollment rate, the program is not producing a sufficient supply of qualified graduates to fill the Division's vacancies. Additionally, the statewide needs assessment noted, across almost all the respondents, staff turnover was a major issue affecting VR service delivery. Not only is turnover seen as a disruption in provision of service, but it affects the relationship and trust that customers have in the VR program. As a result, the Division has placed talent management, including the recruitment and retention of qualified staff, as one of its top 5 priorities in its 4-year strategic plan. Over the next four years, the Division will be working to support a professional workforce that is organized and structured to deliver high quality vocational rehabilitation services through effective teams by advancing a culture of high performance through professional development and accountability; recruiting, developing, retaining and recognizing quality employees and equipping them to deliver high quality service through continuous coaching and training; and sustaining efforts through staff retention and succession planning. To address high turnover and staff attrition, attract and retain top talent within VR, and improve customer experience outcomes, the division evaluated the existing staffing model and made changes to ensure that classifications align with the roles and responsibilities of a modernized, community-based vocational rehabilitation program and that compensation is commensurate with position qualifications, responsibilities, and fair market value. As a result, in 2021, five new classifications were created for the division and two existing classifications experienced salary increases. The new classifications create a career pathway with opportunities for growth and advancement within the division and also serve to ensure counselor supervisors are qualified to lead Master's level rehabilitation counselors and that counselor support personnel exist to alleviate administrative burden.

Legacy data systems – As noted throughout the state plan, the VR Program implemented a new case management system, Aware, from Alliance Enterprises, Inc. to replace TRIMS, the legacy data system used by the division. Aware went live in July 2021. The new system is a more efficient, user-friendly system that supports WIOA reporting requirements and a variety of vocational rehabilitation program case types, including traditional VR cases, Independent Living (IL) cases, Independent Living Older Blind (ILOB) cases, Potentially Eligible (PE) cases, and allows for staff of Community Tennessee Rehabilitation Centers (CTRCs) and TRC Smyrna to access and store essential case information in one comprehensive case management system. The new system was designed to simplify data collection and report generation for staff, allowing for greater transparency and access to program-related data. The system was chosen in part because it is scalable and agile enough to implement changes to data collection and reporting in a timely manner and is designed to identify and easily collect all data fields required by the VR Service Programs federal partners, the Rehabilitation Services Administration (RSA). The system also permits budgeting, facilitates fiscal transactions through external interfaces, and provides statistical and management report generation in accordance with the applicable state and federal regulations, particularly WIOA. It also has the capability of accepting and storing program documentation and generation of all federal reports, as well as division-specific reports, allowing the VR Program the opportunity to collect and accurately report on crucial program data.

The system was designed to empower staff, customers, and providers with access to information that was not always easy to access from our legacy system, TRIMS, including better and more accurate information related to various timelines within the lifecycle of a VR case, including referral, application, and service delivery dates.

- 2) An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:
 - (A) Identify the strategies that contributed to the achievement of the goals.

Response provided in section p.1.A above.

- (B) Describe the factors that impeded the achievement of the goals and priorities.

Response provided in section p.1.B above.

- 3) The VR program's performance on the performance accountability indicators under section 116 of WIOA.

Response provided in section p.1.A above.

- 4) How the funds reserved for innovation and expansion (I&E) activities were utilized.

Innovation and expansion activities remain central to the Division's achievement of its goals and priorities for both VR and Supported Employment. Two key endeavors include the Division's partnership with the University of Tennessee, Center for Literacy Education and Employment (UT CLEE) and Vanderbilt University's Kennedy Center.

The innovation and expansion work of UT CLEE focuses on two primary areas. First, three regional UT CLEE Training Coordinators provide professional development services through training and technical assistance support for community rehabilitation service providers. Each month training sessions are offered across the state for newly hired employment service providers. The Training Coordinators conduct training in classroom settings to review and define employment services including: 1) Overview of the Workforce Innovation and Opportunity Act and Competitive Integrated Employment; 2) Vocational Assessments; 3) Job Readiness/Job Placement; 4) Job Coaching; 5) Supported Employment; and 6) Customized Employment. Field work is assigned to the newly hired employment services staff to provide them with practical experience in areas of vocational assessment, job coaching and job developing. The newly hired staff return to the classroom for a second session to share field experiences and discuss best practices. In addition, UT CLEE offers monthly continuing education workshops across the state, highlighting best practices to enhance the skills of employment service providers. Second, four regional UT CLEE Business Coordinators support the work of the Division with businesses through the coordination of targeted marketing, delivery of human resource services, and

the development of new initiatives to increase employment opportunities for qualified job candidates with disabilities. Business Coordinators conduct training for businesses on topics such as Disability Awareness/Etiquette, Business Incentives, Job Accommodations, etc. Working under the guidelines of the Workforce Innovation and Opportunity Act, partners collaborate within the community to better serve the business customer. Business Coordinators work to engage Division staff in these activities, along with providing staff professional development through training and technical assistance.

Additionally, the state has partnered with Vanderbilt University and the Vanderbilt Kennedy Center to develop an on-line portal on the Transition Tennessee website that focuses specifically on Pre-Employment Transition Services. Launched in spring 2019, this website expands the state's capacity to provide high-quality, evidence-based pre-employment transition services that lead to successful post-secondary and employment outcomes for students with disabilities. The Transition Tennessee Pre-ETS Blueprint serves as an online hub for professional development and resources on Pre-ETS and offers guidance on the components of Pre-ETS to assist providers in delivery of these services. This new portal includes two courses on the foundations of Pre-ETS: 1) The Power of Early Work Experiences and 2) Overview of WIOA and Pre-ETS. Each course features free video modules, downloadable resources, webcasts, and information about upcoming conferences and trainings. Additional courses will be added that focus on Interagency Collaboration, Connecting with Employers and Families, the Student-Centered Approach to Transition Instruction, and each of the five pre-employment transition services.

Innovations and expansions such as these will continue to serve the Division's customers well into the future and provide a solid foundation for additional growth and development.

(q) Quality, Scope, and Extent of Supported Employment Services. Include the following:

- 1) The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.

The Division continues to provide supported employment services to eligible individuals with the most significant disabilities who have been determined by the Division to require supported employment services and extended and on-going support services in order to obtain and maintain competitive integrated employment in accordance with 34 CFR § 361.5(c)(9), 34 CFR § 361.5(c)(19), 34 CFR § 361.5(c)(37), 34 CFR § 361.5(c)(53), and 34 CFR § 363.

It is the continued goal of the Division to provide quality supported employment services which are delivered in an effective, efficient, and timely manner. Supported employment services are provided by preferred Community Rehabilitation Providers approved by the Division and in collaboration with programs developed by the Departments of Intellectual and Developmental Disabilities (DIDD) and Mental Health and Substance Abuse Services (DMHSAS), and by the Division of TennCare (TN's Medicaid program).

The VR Program served 2,780 individuals in FFY 2020 and 2,750 individuals in 2021 under a supported employment IPE. It is projected that the VR Program will serve an estimated 2,887 individuals in FFY 2022 and 3,031 in FFY 2023 under a supported employment IPE.

Eligible individuals are assessed by VR Counselors to determine if extended and on-going support services are needed to support an individual with the most significant disability in competitive integrated employment. Individuals are then referred to approved CRPs for the development and provision of supported employment services and extended and on-going supports (including natural supports).

Interagency agreements have been signed and implemented that provide for the following partnerships and collaboration:

- The agreement with the DMHSAS provides collaboration in the use of evidence based Individual Placement & Support (IPS) supported employment in assisting individuals with mental illness and co-occurring disorders of alcohol and drug abuse to obtain and maintain competitive integrated employment. The Division has 11 preferred CRPs that can provide IPS SE services, and more are expected to be added in the coming year.
- The agreement with the Division of TennCare, Long Term Services and Supports, provides for the provision of supported employment services for persons enrolled in the Employment and Community First (ECF) CHOICES program who have intellectual or developmental disabilities. Beginning in July 2016, Tennessee, through the ECF CHOICES program, became the first state in the country to develop and implement an integrated, home and community-based services program, aligning incentives toward promoting and supporting integrated, competitive employment and independent living as the first and preferred option for individuals with intellectual and developmental disabilities. The agreement intends to ensure that services are coordinated, seamless, and efficient. The Division and TennCare coordinated training efforts to implement the agreement requirements and continue coordinated efforts for the provision of services and technical assistance.

The Division has implemented a pilot program utilizing IPS SE services for individuals with mental illness who are receiving Temporary Assistance for Needy Families (TANF). The Division and TANF share in funding the services.

IPS has become a promising SE program for individuals with mental illness who may also have other diagnoses. The Division is exploring, in collaboration with the DMHSAS and DIDD, providing IPS SE for individuals with dual diagnoses such as intellectual or developmental disabilities and mental illness. The Division is identifying preferred CRPs who work with DIDD/ECF CHOICES providers. A pilot program with one mental health provider has been implemented to learn more about the applicability of IPS SE for individuals with dual diagnoses.

The Division, along with DMHSAS, DIDD, Department of Labor and Workforce Development, Department of Education, and the Division of TennCare, has committed to participating in the expansion of the Individual Placement and Support (IPS) services through application for the U.S. Department of Labor (DOL), Office of Disability Employment Policy's (ODEP's) Visionary Opportunities to Increase Competitive Employment (VOICE) grant. The Application requests 200 hours of technical assistance to expand IPS Services statewide, to provide collaboration on opportunities, resources and training to mental health and DIDD providers statewide to effectively support individuals with dual diagnoses (I/DD and mental illness) who want to pursue competitive integrated employment and to provide resources and guidance to develop cross-training for American Job Center staff to effectively support people with disabilities, including veterans and people with behavioral health diagnoses.

The Division has contracted with the University of Tennessee, Center for Literacy, Education and Employment to develop training for CRPs to ensure competency and compliance with the Divisions' requirements for SE services and on how to develop natural supports (employer, supervisor, co-worker, family member) to address extended and on-going support services where funding is not available from another Agency.

The Division continues its efforts to increase SE CRPs and expects the number of CRPs will increase. The Division is actively pursuing CRPs for underserved areas across the state and for rural and distressed counties. The Division will continue with and seek new partnerships and collaboration with appropriate state agencies and with private and/or non-profit agencies which have the capabilities of providing quality SE service delivery and extended and on-going support services across the state, including those agencies where supported employment services can be provided to persons being transitioned from institutional settings to the community and competitive integrated employment settings.

The VR Program served 2,780 individuals in FFY 2020 and 2,750 individuals in 2021 under a supported employment IPE. It is projected that the VR Program will serve an estimated 2,887 individuals in FFY 2022 and 3,031 in FFY 2023 under a supported employment IPE.

As mandated, the Division has set aside applicable VR funds for extended services for youth with the most significant disabilities who require supported employment but whose extended services are not funded by other entities or sources.

The Division has established appropriate services, trained service providers, and defined the criteria for extended and on-going support services that will be provided for youth with disabilities.

Extended services may be provided for a youth with a disability for up to four (4) years or until the client turns twenty-five (25) years of age, whichever comes first. Extended services for youth may be funded by another state agency or other client resources, such as a Social Security PASS or IRWE; provided by natural supports; or funded by VR provided there are no other means of funding for providing the extended services and the youth has not declined VR providing extended services. If VR funds extended

services for a youth with a disability, the case cannot be closed until the time period for providing extended services ends.

For the provision of extended services to youth with disabilities who received supported employment services, the Division will continue to collaborate and find partnership opportunities with DIDD, DMHSA, Department of Education, and other entities to continue outreach to transition students that may need supported employment.

The Division will work with the Department of Education through the Pre-Employment Transition Services program to provide work experiences that can assist and provide transition students with a more positive and encouraging employment experience.

The Division expects to continue increasing competitive integrated employment opportunities for individuals with severe mental illness, including those with co-occurring disorders of alcohol and drug abuse by expanding more effective partnerships with mental health entities through the evidenced based Individual Placement and Support (IPS) Supported Employment Services.

The Division is currently in discussion with TennCare and other partners who are supported by TennCare, to identify ways to further align policies and funding that would allow supported employment services to be provided to a broader population.

The Division will continue to work with CRPs, managed care organizations (Amerigroup, BlueCare, and United Health Care) and other entities to review policies, training, identify improvements and best practices for the ECF CHOICES program.

The Division will continue to work with disability specific stakeholders and advocacy groups such as the Autism Society and chapters of The Arc in Tennessee in conducting collaborative meetings to help identify sources of support.

The Division will continue to work with the mental health community for expansion and sustainability of the Individual Placement and Support SE services.

The Division will continue to encourage CRPs to become Employment Networks as possible funding sources for extended and on-going support services. The Division will continue to train CRPs and VR staff to increase usage of SSA PASS plan and other work incentive programs.

The Division will assure that funds made available will only be used to provide Supported Employment services to individuals who are eligible to receive such services.

The Division's case management system can identify SE cases and service expenditures as required by the RSA.

2) The timing of transition to extended services.

The Division coordinates with other state agencies and the community rehabilitation providers to transition individuals receiving supported employment services to extended and on-going support services. An individual is moved to extended and on-going support services when the client has reached a point where he/she has achieved maximum performance on the job; has achieved minimum necessary supports on the job; the job is not in jeopardy of ending; and the individual is maintaining work performance which is acceptable to the employer and the individual.

Attachment 1

Vocational Rehabilitation Program

Employment (2nd Qtr after Exit): PY 2022 Expected Level – 49%, PY 2023 Expected Level - 51%

Employment (4th Qtr after Exit): PY 2022 Expected Level – 48%, PY 2023 Expected Level - 50%

Median Earnings (2nd Qtr after Exit): PY 2022 Expected Level - \$4,305, PY 2023 Expected Level - \$4,520

Credential Attainment Rate: PY 2022 Expected Level - 30%, PY 2023 Expected Level - 33%

Measurable Skill Gains: PY 2022 Expected Level - 61%, PY 2023 Expected Level - 67%